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FINAL

City and County of San Francisco  
San Francisco City Planning Commission

Environmental Impact Report

# Montgomery - Washington Building

Final  
81.104E

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Publication Date: November 13, 1981

Public Comment Period: November 13, 1981 through  
December 17, 1981

Public Hearing Date: December 17, 1981

Certification Hearing Date: January 28, 1982

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- Solid dots at the beginning of each revised section, paragraph, figure or table indicate changes from the text of the Draft EIR.

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I. SUMMARY

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A. PROJECT DESCRIPTION

The project sponsor, Crow-Spieker Companies of San Francisco, doing business as Trammell Crow Company, proposes to construct a 24-story combined office and residential building in the northwestern Financial District. The site is bounded by Washington St. on the north, Montgomery St. on the east, Merchant St. on the south, and the Chinatown Holiday Inn on the west. The project is intended to satisfy some of the existing demand for both office space and housing in San Francisco.

The proposed building would be 300 ft. high with about 331,700 gross sq. ft. of floor area. The project would contain ground floor retail and restaurant space, 15 floors of office space, and six floors of residential space. Gross floor area of the commercial portion of the building would be approximately 243,600 sq. ft. Project plans include approximately 88,100 gross sq. ft. of residential space.

The ground floor would contain separate office and residential lobbies and about 4,000 sq. ft. of retail and restaurant space. The second floor with mezzanine would provide about 25,000 sq. ft. of parking space, accommodating about 62 vehicles. The third through 17th floors would contain about 236,600 gross sq. ft. of office space. The 18th floor would be a transition floor between the office and residential portions of the building. It would contain mechanical service areas, an athletic/health club and residential common area, and residential space. The residential space on the transition floor would contain the lower portions of the townhouse units with entrances on the first residential floor. The six floors from the 19th through the 24th would be occupied by about 40 residential condominiums.

The first residential floor would contain a patio and pool area in the southwest corner, as common open space. Most residential units would have a private balcony or terrace. There would also be rooftop open space and a mechanical penthouse.

The project site contains about 17,400 sq. ft., consisting of Lots 2, 3, 4 and 25 of Assessor's Block (A/B) 208. The site is currently occupied by a surface parking lot, a one-story brick structure at 639 Montgomery St., a two-story brick structure at 643 Montgomery St. and a fenced-in, vacant lot. The project would result in the demolition of the existing structures on the site.

B. ENVIRONMENTAL EFFECTS

The project tower, proposed to be 300 ft. tall, would be the maximum height permitted, as the site is located in the 300-H Height and Bulk district. The proposed project would comply with the height and bulk restrictions which apply within this district. The building length would be about 130 ft., 40 ft. less than the permitted maximum of 170 ft. The diagonal dimension of 180 ft. would be about 20 ft. less than the maximum of 200 ft. Changes in the existing height and bulk controls are being studied by the Planning Commission. The project in relation to proposed changes is discussed in Sections IV., Environmental Impact - Land Use, and VII., Alternatives, related to Guiding Downtown Development proposals.

Gross floor area of the office lobby, retail, restaurant and office space would be approximately 243,600 sq. ft., a Basic Floor Area Ratio (FAR) of about 14:1. The project plans include 88,100 gross sq. ft. of housing, an FAR of approximately 5.1:1. The total gross floor area for the building would be approximately 331,700 sq. ft., an FAR of about 19.1:1. The square footage of the proposed residential units would cause the building to exceed the allowable Basic 14:1 FAR for a structure in the C-3-0 district.

The use of development bonuses, described in Section 126 of the City Planning Code, would permit space in addition to the Basic FAR. Permitted bonus space could be used for, and would be limited to, housing under the existing Interim

Controls on downtown high-rise office development. The project sponsor intends to request approximately 83,700 sq. ft. of bonus floor area. This bonus space would be based upon provision of multiple building entrances, shortened walking distances, sidewalk widening, a rooftop observation deck and parking access. Bonus space identified by the project sponsor could allow a total gross floor area for the building of about 327,300 sq. ft., for an FAR of about 18.8:1. The project proposes a total of 88,100 sq. ft. of residential space, about 4,400 sq. ft. more than the identified bonuses would allow. Because the project would exceed the allowable FAR of 14:1 plus identified bonus space, it would not conform to the City Planning Code. An amendment to the City Planning Code, and possibly a change in the Interim Controls, would be required to allow approval of the project. According to the Department of City Planning housing formula, the project would generate demand for about 210 units of housing in San Francisco; the project would provide about 40 on-site residential units, containing about 90 bedrooms.

The proposed project would be stepped down in its upper northeast and southeast-facing facades. The architect intends the design to visually complement adjacent buildings and provide a transition between nearby high-rises and the smaller structures of the Jackson Square Historic District to the north and northeast.

The project would be visible in the downtown skyline from some long-range viewpoints. The structure would be visible from Telegraph Hill, obstructing existing views of the 601 Montgomery St. building. From Chinatown, the project would be visible between the Holiday Inn and the 601 Montgomery St. building, obstructing views of lower portions of the Transamerica Pyramid building. When viewed from long-range viewpoints to the northeast, north and west, the project would not be a major visual focus in the downtown panorama due to the prominence of taller structures, such as the Transamerica Pyramid and Bank of America headquarters. The project would not be visible from the southern approaches to the City on the James Lick and Bayshore freeways or from Potrero Hill, due to intervening structures.

The project, in replacing existing low-rise structures, would create a more extended shadow pattern than exists at present, especially north and northeast

of the site. Much of the project shadow pattern would coincide with those shadows cast by existing structures in the area (601 Montgomery St., Holiday Inn, and the Transamerica Pyramid). The project would not shade any existing public parks. Portions of the widened sidewalk and seating area on the north side of the Transamerica Pyramid would be shaded in the late afternoon at all seasons of the year.

The project would change the existing wind environment of the site vicinity. Under northwest wind conditions, the intersection of Clay and Montgomery Sts. would be less windy and gusty than under existing conditions. There would be increased steady winds around the northeast corner of the proposed building, and at the building entrances under the proposed covered walkways.

Under westerly winds, the project would result in stronger winds than now exist, increasing street-level turbulence and gustiness directly east of the proposed building. This turbulence and gustiness would be variable, changing over short distances under the covered pedestrian walkways and at the building entrances on Montgomery St.

The project would result in the demolition of the existing buildings on the site, which include about 3,300 gross sq. ft. of office space, 5,200 gross sq. ft. of restaurant space and 7,300 gross sq. ft. of parking space. Upon completion, the project would result in a net increase of about 233,300 gross sq. ft. of office space, 88,100 square feet of residential space and 17,700 gross sq. ft. of parking space, and the net loss of about 1,200 gross sq. ft. of restaurant/retail space. The project would provide about 40 on-site residential units.

The net increase in employment at the site upon project completion would be about 950 permanent jobs. Secondary employment impacts would result from permanent project employment; about 1,140 additional jobs in other sectors of the Bay Area economy would result. The project would require about 300 person-years of construction labor, an average of about 150 full-time jobs throughout the nearly two-year construction period. About 480 additional labor-years of employment would be generated in the Bay Area as a result of the multiplier effect of project construction.

● The project would increase traffic volumes on the freeway feeder streets, and on streets near the proposed project, above projected 1984 peak-hour traffic levels by no more than 2% on any of the freeway approach streets. The impact of the project would be an imperceptible lessening of the Level of Service of traffic operation on the street system. The level of operation would not be decreased by more than 1% of the 1984 base conditions by project traffic. Demand for short-term parking in the project vicinity presently exceeds the supply. The project would create an on-site parking deficit for the office portion of the building of approximately 310 spaces. Service vehicle access would be on the second floor parking level of the building, by ramp from Merchant St. Project demand would be for about four loading spaces. The project would not be able to meet its average demand for loading space with off-street loading facilities. The existing loading zones on the Montgomery St. frontage would be able to handle the excess demand.

Of the 53 Muni lines serving the Downtown San Francisco area, 36 operate within a walking distance of 2,000 ft. of the site. Considering trips to be generated by cumulative development in the Downtown, it is estimated that in 1984, 26 of these lines would operate during the p.m. peak hour beyond maximum recommended capacity (beyond 150% of seated capacity). The project would contribute about 220 peak-hour trips to these lines, a less than 1% increase.

Air quality impacts associated with operation of the project would result primarily from vehicle emissions. Implementation of the project would add to local and regional accumulations of pollutants during adverse meteorological conditions. The project would probably have no measurable impact on citywide or regional air pollutant concentrations nor on the frequency of violations of the standards.

Estimated total energy use for the project would be 175,000 Btu at-source per sq. ft. per year. The internal heat generated by the project would be reclaimed by the use of a small fan/coil unit at each floor which would deliver warm air to the building perimeter to replace heat lost through the building skin. Waste heat from office lights and computer rooms would be used to augment heating needs for the condominiums.

Construction activities would temporarily increase noise levels in the site vicinity. The project would be expected to use a mat (cellular) foundation, which would not require pile driving.

The presence of about 40 condominium apartments in the northwest corner of the City's Financial District could generate a demand for domestic retail services. To the extent that they are not located within the project, new facilities could be induced to locate in the vicinity. The placement of residential units in this location could encourage other new developments in the Financial District to include housing.

### C. MITIGATION MEASURES

Primary mitigation measures proposed as part of the project include:

- The project sponsor would urge the Board of Supervisors that the portion of the proceeds from the sale of Lot 25, which represents the difference between the actual acquisition costs for the property and the sale price, be used to purchase land for open space in Chinatown.
- The project would include pedestrian-scale retail activity and widened sidewalks to improve pedestrian access to work, shopping and transit facilities, and to contribute to a visually interesting streetscape. Ground-floor commercial activity would include a combination of uses such as a restaurant, apparel store, stationery store and/or travel agency. Retail space would not include any financial institutions although an automatic banking terminal may be provided.
- The project would include street trees and sidewalk plantings on Montgomery and Washington Sts. The entry plazas, residential lobby, and pool area would be landscaped. Street-side glass walls, vegetation, or other screening would be used to provide pedestrian protection at the covered walkway area and to modify the project's wind effects on pedestrians.

## I. Summary

- The project's sculptured upper-level facades would reduce the apparent scale and bulk of the building, and may provide visual interest to viewers from Telegraph Hill, Columbus Ave. and the Jackson Square Historic District.
- The project sponsor would use a decorative paving material on the Merchant St. sidewalk fronting the site to enhance pedestrian interest, and would consider installing decorative paving on Merchant St.
- The project would contain about 40 residential condominiums. Units would vary from 1,200 to 2,400 sq.ft., providing a range in size. Project housing would partially mitigate increased demands on the City's housing supply expected to be generated by the project's office development.
- The project sponsor would participate proportionately in whatever legal means is finally adopted by the Board of Supervisors for an established Downtown transit assessment district to meet the peak demands caused by cumulative office development in the Downtown area.
- A transportation broker in the project management office would encourage transit use through the sale on-site of BART and Muni passes to employees, and facilitation of employee carpool and vanpool systems in cooperation with RIDES for Bay Area Commuters.
- Secure bicycle parking facilities would be provided to encourage the use of bicycles by employees and messengers. Handicapped parking and handicapped access facilities would be provided in the proposed parking garage.
- The building would have "eyebolt" fixtures on the Montgomery and Washington St. frontages suitable for suspending Muni trolley wires.
- Upon project completion, the project sponsor would encourage tenant firms to implement a flexible time ("flex-time") system for employee working hours. (Flex-time is designed to reduce peaks of congestion in the transportation system.)

- The project's heating, ventilating and air conditioning (HVAC) system would be equipped with an economizer cycle to use outside air for cooling, as feasible.
- Wherever possible, office suites would be equipped with individual light switches, time-clock operation and fluorescent lights to conserve electric energy. A centralized management computer system would monitor off-hour (evenings and weekends) heating and air-conditioning use. Tenants would be charged for off-hour heating and air-conditioning service, to encourage energy conservation.
- The project sponsor and project engineer have met with the Energy Conservation Department of the San Francisco Public Utilities Commission to present measures that would be taken to assure energy conservation.

#### D. ALTERNATIVES TO THE PROPOSED PROJECT

Alternative One would develop a combined office and condominium residential building on the project site which would conform to the City Planning Code and Interim Controls. Alternative One would be similar to the proposed project in height, design, and commercial floor area. This alternative would include about 35 condominiums, five fewer than the proposed project, so that the residential floor area would be consistent with identified bonus space. The impacts of Alternative One would generally be as described for the project. This alternative is under consideration by the project sponsor.

Alternative Two, the no-project alternative, would retain the existing two structures on the project site. The environmental characteristics of this alternative would be substantially the same as with present conditions. Alternative Two has been rejected by the project sponsor because it would not provide additional office space and residential units to meet existing demand in San Francisco, and because it would be an economic underuse of the site.

Alternative Three would consist of an office building, about 215 ft. in height. There would be no housing provided on the site. This alternative would contain about 243,600 gross sq. ft. for an FAR of 14:1. Construction impacts of this alternative would be similar to those of the project. Alternative Three would be about 85 ft. shorter than the project, resulting in decreased visual effects and energy consumption. The project sponsor has rejected this alternative as not contributing housing to partially meet existing demand in San Francisco.

Alternative Four would involve development of a combined office and residential building on three parcels of the project site, excluding Lot 25 at the Washington-Montgomery corner. Alternative Four would contain about 176,000 sq. ft. of office space, for an FAR of 14:1, and would apply allowable bonuses for residential use on the project site. Approximately 43,000 sq. ft. of bonus space has been identified, for an overall floor area of about 219,000 sq. ft. and an FAR of about 17.4:1. This alternative would be about 272 ft. in height. Construction impacts of this alternative would be similar to those of the project. Operational impacts of Alternative Four would be similar to the project, but proportionally less because of the decreased building size. This alternative would result in an open-ended project block as Lot 25 would remain vacant unless subsequently developed. Alternative Four is under consideration by the project sponsor.

Alternative Five would consist of a structure which would comply with development controls recommended in the Department of City Planning document, Guiding Downtown Development. This alternative would involve development of a combined office and residential building on the project site. The structure would contain about 208,800 gross sq. ft. of office space for an FAR of 12:1. Residential use would occupy about 35,000 gross sq. ft. for an additional FAR of 2:1. The overall FAR of Alternative Five would be 14:1 and the building height would be 250 ft. The maximum FAR allowed under the provisions contained in Guiding Downtown Development would be 17:1, including 5:1 for housing, but the proposed height limit of 250 ft. would not permit the development of the maximum FAR for the site. Construction impacts of Alternative Five would be similar to those of the proposed project. This

alternative would be about 50 ft. shorter than the project, resulting in decreased visual effects and energy consumption. The project sponsor has rejected this alternative as not providing the amount of office space permitted under the City Planning Code and proposed for the project. In addition, the project sponsor considers the 250 ft. height limit recommended in Guiding Downtown Development an unnecessary limitation on the development potential of the site.

II. PROJECT DESCRIPTION

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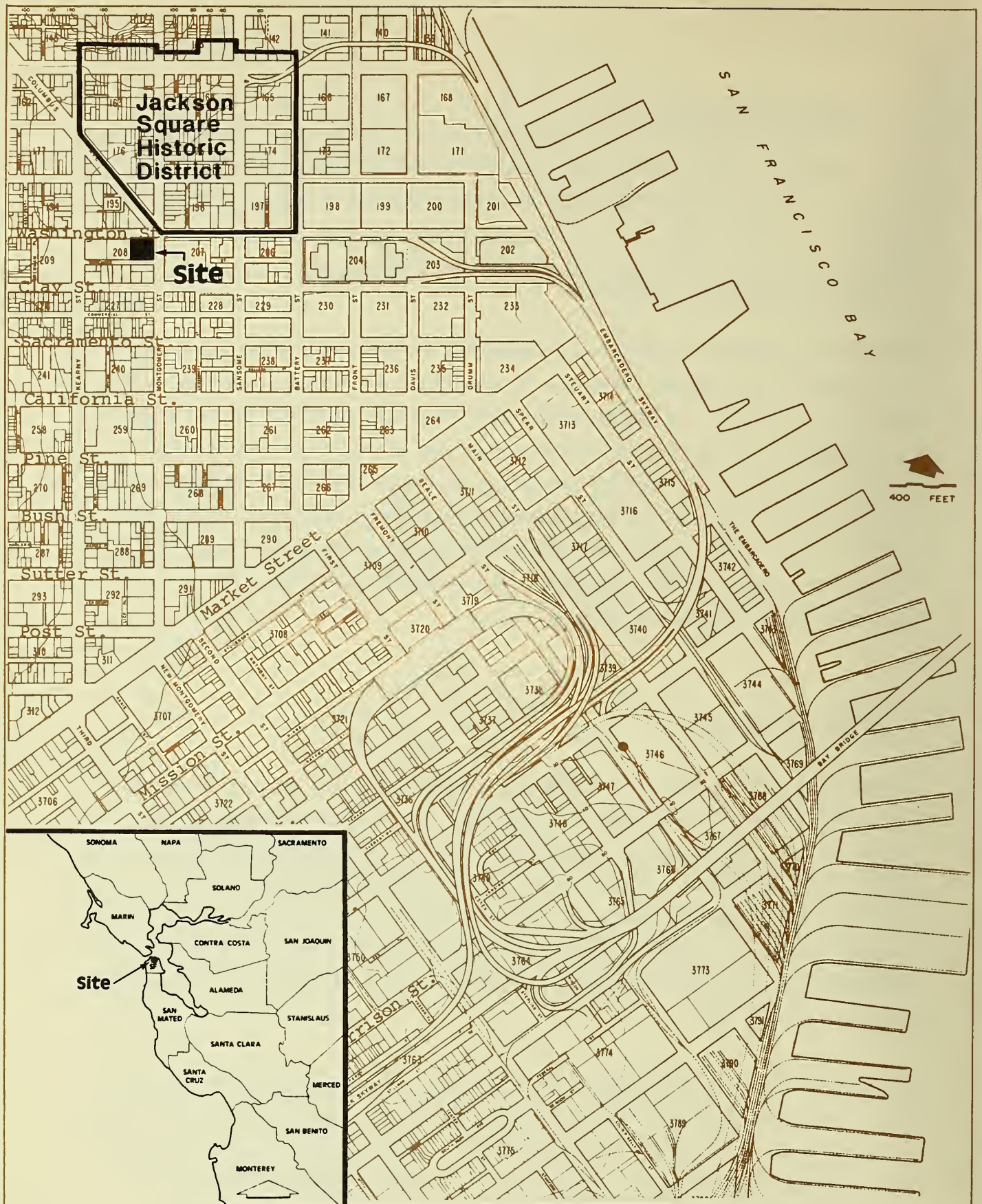
A. PROJECT SPONSOR'S OBJECTIVES

The project sponsor, Crow-Spieker Companies of San Francisco, doing business as Trammell Crow Company, proposes to construct a 24-story combined office and residential building in the northwestern Financial District in San Francisco (see Figure 1). The sponsor's objectives are to construct and manage a high-quality commercial office building, increase the City's housing supply by providing on-site housing, and realize a reasonable return on investment. The project is intended to satisfy some of the existing demand for both office space and housing in San Francisco. The project architect is Kaplan/McLaughlin/Diaz of San Francisco.

B. PROJECT LOCATION

The project site, Lots 2, 3, 4 and 25, at the northeast corner of Assessor's Block (A/B) 208, contains about 17,400 sq. ft. The site is bounded by Washington St. on the north, Montgomery St. on the east, Merchant St. on the south, and the Chinatown Holiday Inn on the west (see Figure 2, p.13). It is located within the northwestern border of the City's C-3-0 (Downtown Office) zoning district. The Transamerica Pyramid building is directly east across Montgomery St. and the 19-story 601 Montgomery St. building is to the south, across Merchant St.

Immediately north and northeast of the site is the Jackson Square Historic District, with the North Beach and Telegraph Hill communities beyond, to the northwest and the northeast, respectively. Approximately one block west of the site lies the Chinatown community. The Golden Gateway residential community is located approximately three blocks northeast of the site.



SOURCE: San Francisco Department of City Planning

Figure 1: Project Location



## Legend

**Project Location**

**FIGURE 2: Project Site and Vicinity**

**SOURCE: Environmental Science Associates, Inc.**

### C. PROJECT DESCRIPTION

The project would be a 300-ft.-high, 24-story building (see Figure 3), with about 331,700 gross sq. ft. of floor area (excluding foundation, mechanical and parking space). The ground floor would contain separate office and residential lobbies and about 4,000 sq. ft. of retail and restaurant uses (see Figure 4, p. 16). The main entrances to the office and retail portions of the building would be on Montgomery St.; access to the condominium lobby would be on Washington St. The second floor with mezzanine would provide about 25,000 sq. ft. of parking space, accommodating about 62 vehicles, and about 3,300 sq. ft. of loading space, accommodating two service vehicles. Access to both parking and loading docks would be from Merchant St., near the Holiday Inn (see Figure 5, p. 17). The third through 17th floors would contain about 236,600 gross sq. ft. of office space. The average gross floor area for office floors would be about 16,000 sq. ft. (see Figure 6, p. 18). The office, lobby, retail, and parking portions of the building would rise to a height of approximately 216 ft. The 18th floor would be a transition floor between the office and residential portions of the building, containing about 3,100 sq. ft. of mechanical service area, 7,500 sq. ft. of residential space, 3,600 sq. ft. of athletic health club and 1,300 sq. ft. of residential common area (see Figure 7, p. 19). The health club and common area would serve as common facilities for the residents of the building. The residential space on the transition floor would contain the lower portions of the townhouse units with entrances on the first residential floor.

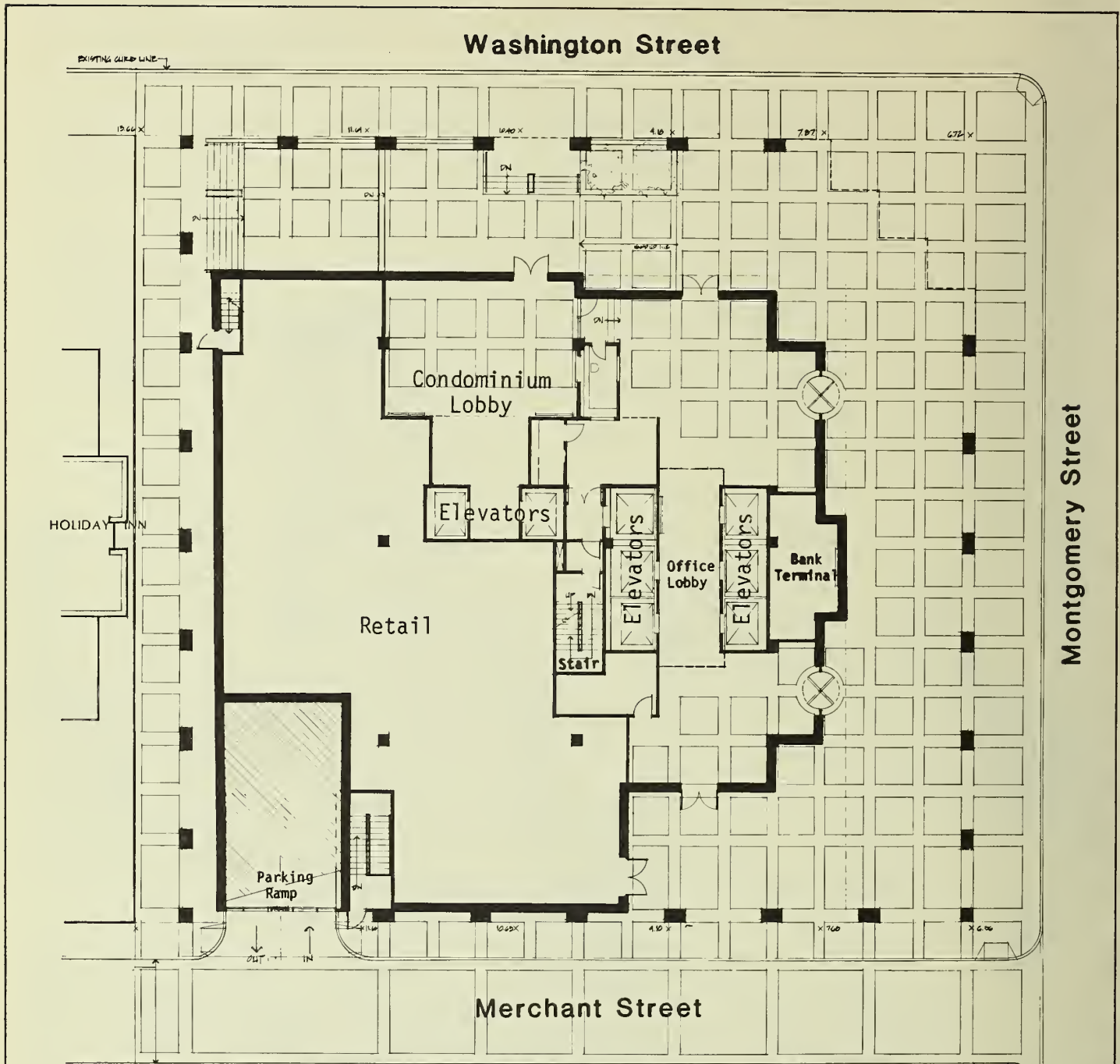
- The six floors from the 19th through the 24th would be occupied by about 40 residential condominium units (see Figure 8, p. 20). Gross floor area for the residential portion of the building would be about 88,100 gross sq. ft. About 78,500 sq. ft. would be for the dwelling units; the remainder would include the health club, residential common area and condominium-related mechanical areas (lobby and elevator core). The first residential floor would contain a common patio and pool area, of about 3,100 sq. ft., at the southwest corner. Most residential units would have a private balcony or terrace, for a total of about 4,400 sq. ft. of private open space. There would be a public, rooftop observation deck, of about 750 sq. ft., and a mechanical penthouse (see Figure 8A, p. 20a). Total open space proposed as part of the project would be about 8,250 sq. ft.



←Project→

SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 3: Photomontage of Project (View from the North on Montgomery Street)



**LEGEND**

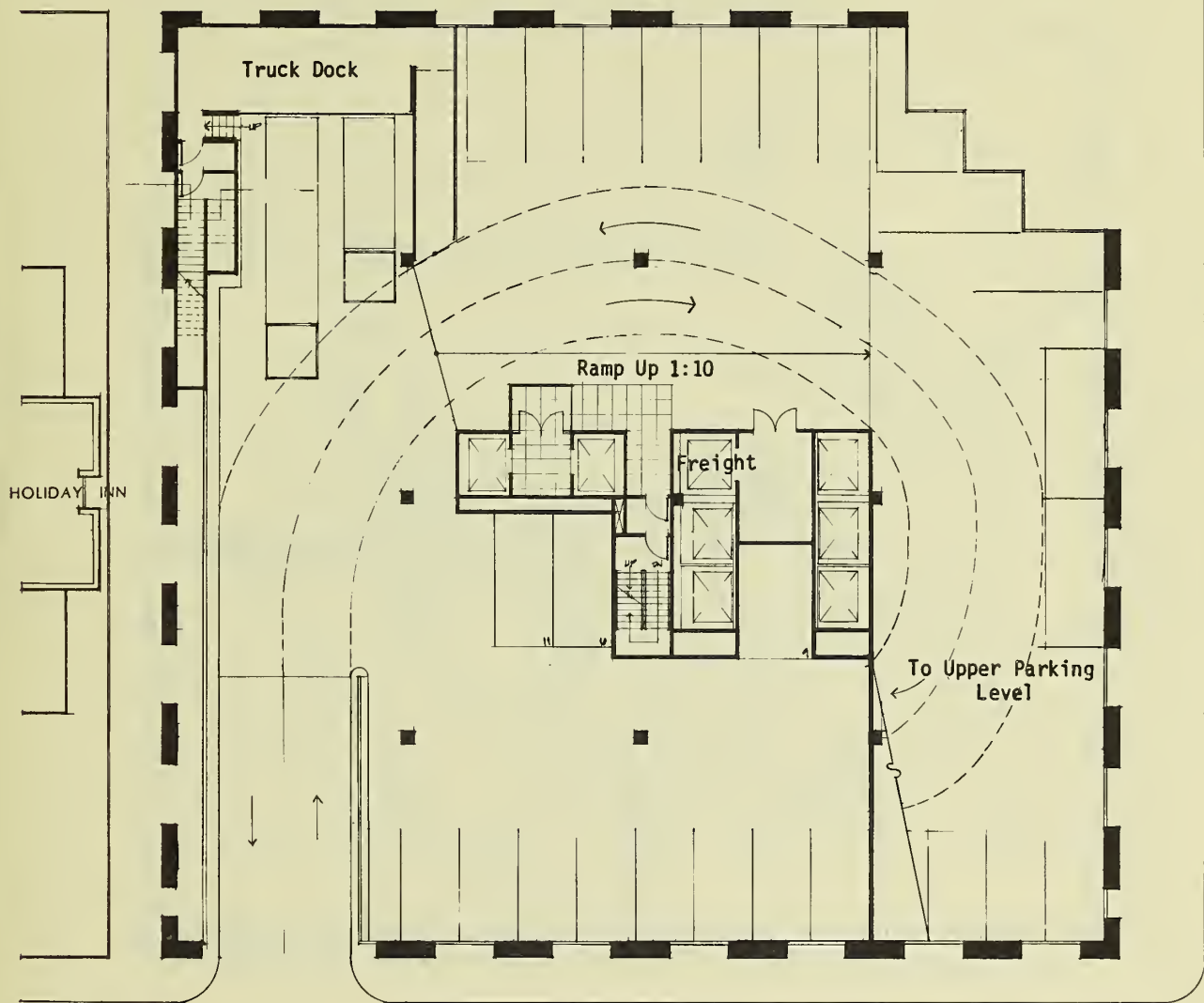
- Columns
- Building Envelope



SOURCE: Kaplan/McLaughlin/Diaz

**FIGURE 4: Ground Floor Plan**

Washington Street



HOLIDAY INN

Truck Dock

Ramp Up 1:10

Freight

To Upper Parking Level

Merchant Street

Montgomery Street

### LEGEND

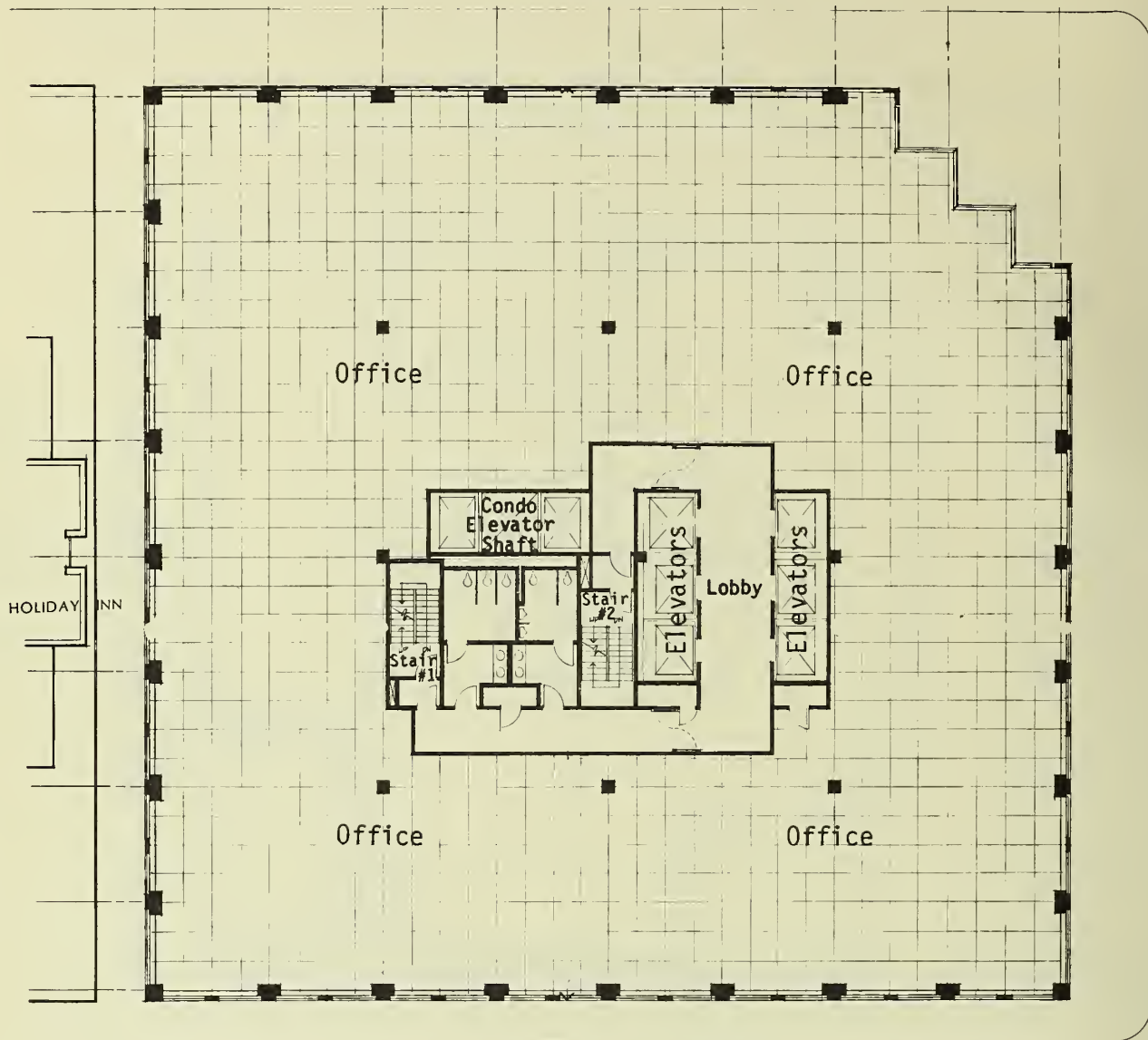
■ Columns



SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 5: Parking Level Plan

Washington Street



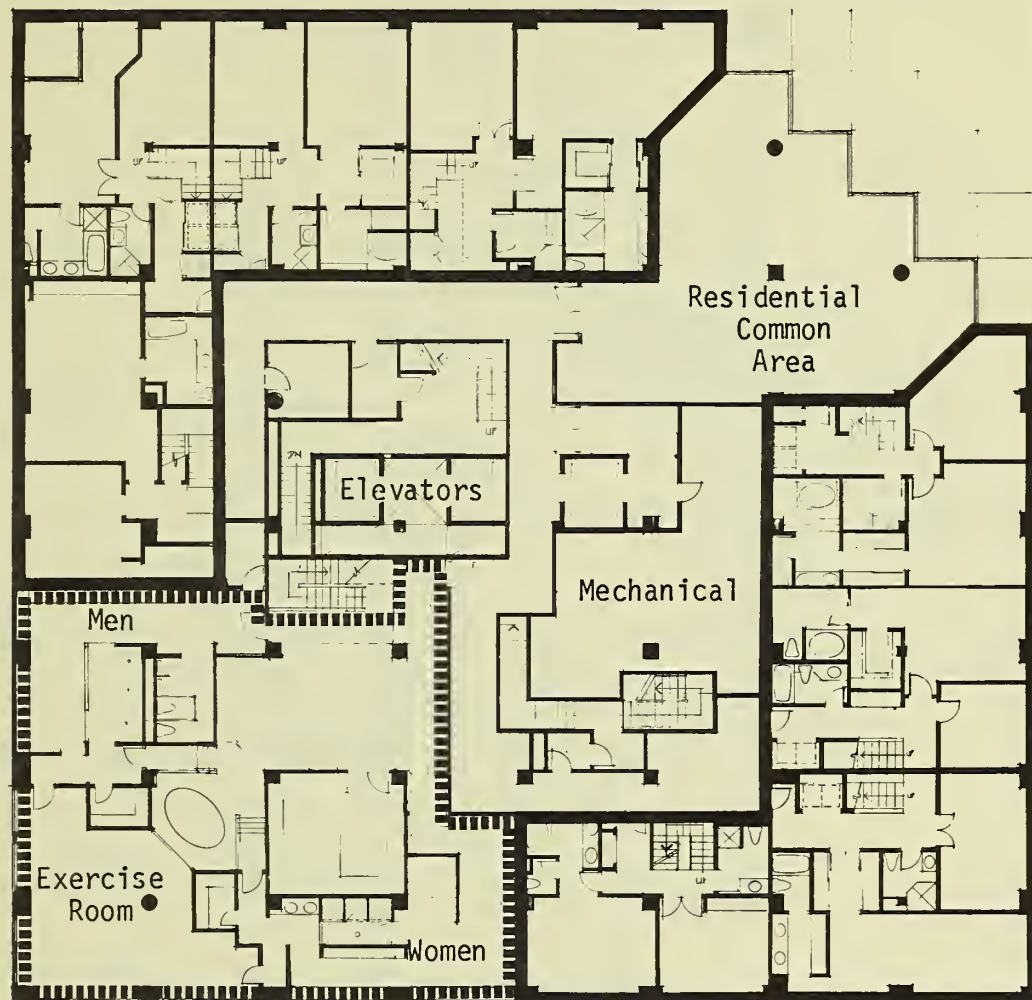
**LEGEND**

■ Columns



SOURCE: Kaplan/McLaughlin/Diaz

**FIGURE 6: Typical Office Floor Plan**



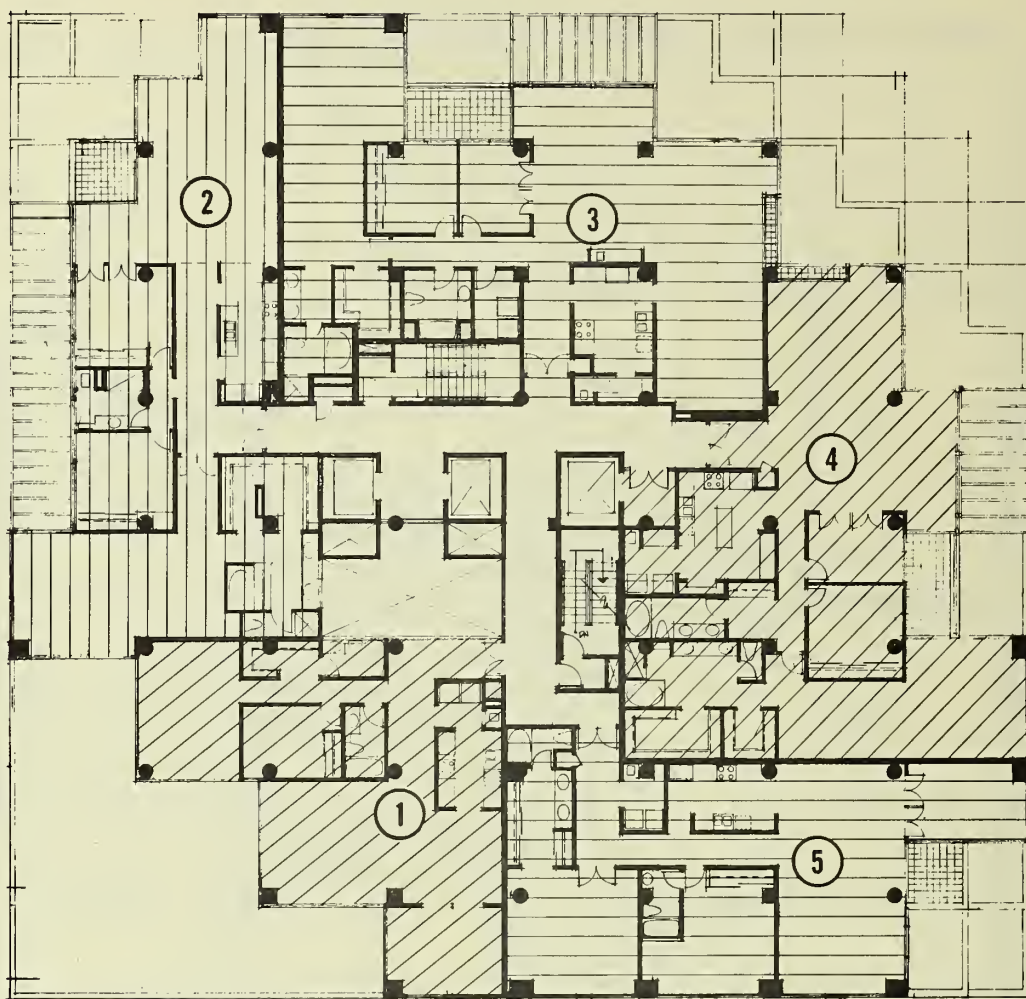
# **LEGEND**

- Columns
- ▨ Health Club
- ▬ Residential Units (lower level of townhouses)



SOURCE: Kaplan/McLaughlin/Diaz

**FIGURE 7: Transition Floor Plan**



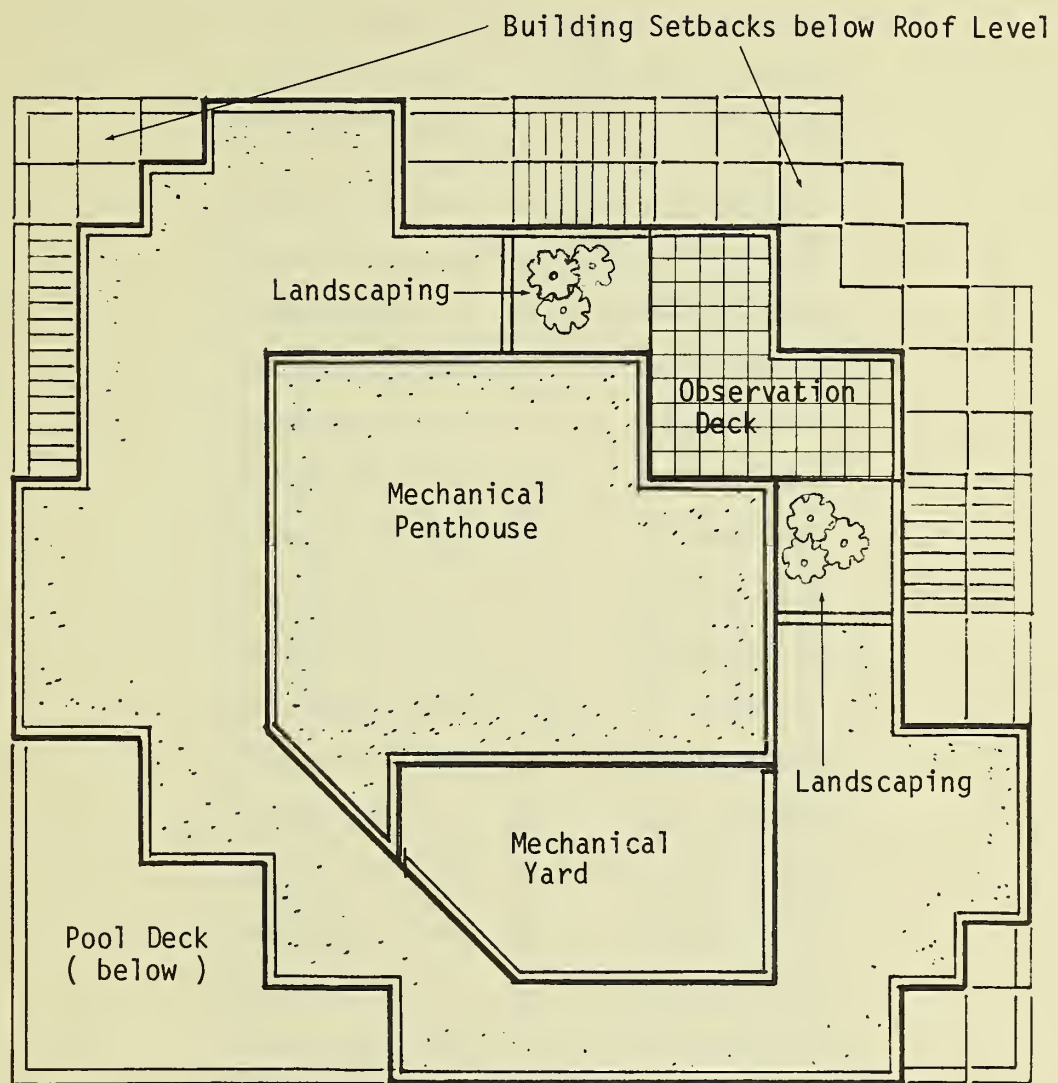
## LEGEND

- ① Residential Units



SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 8: Typical Condominium Floor Plan

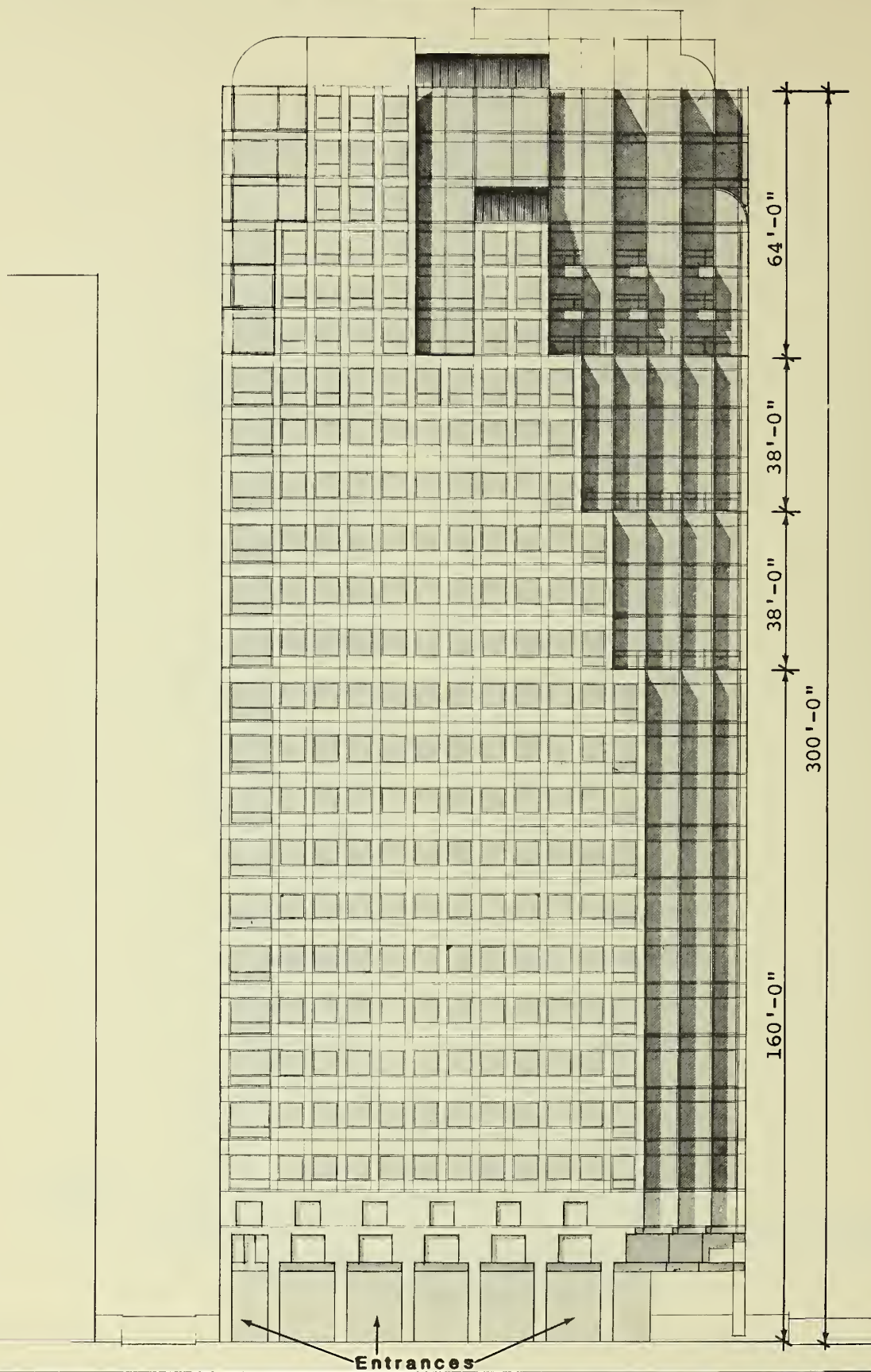


SOURCE: Kaplan/McLaughlin/Diaz

● FIGURE 8A: Roof Floor Plan

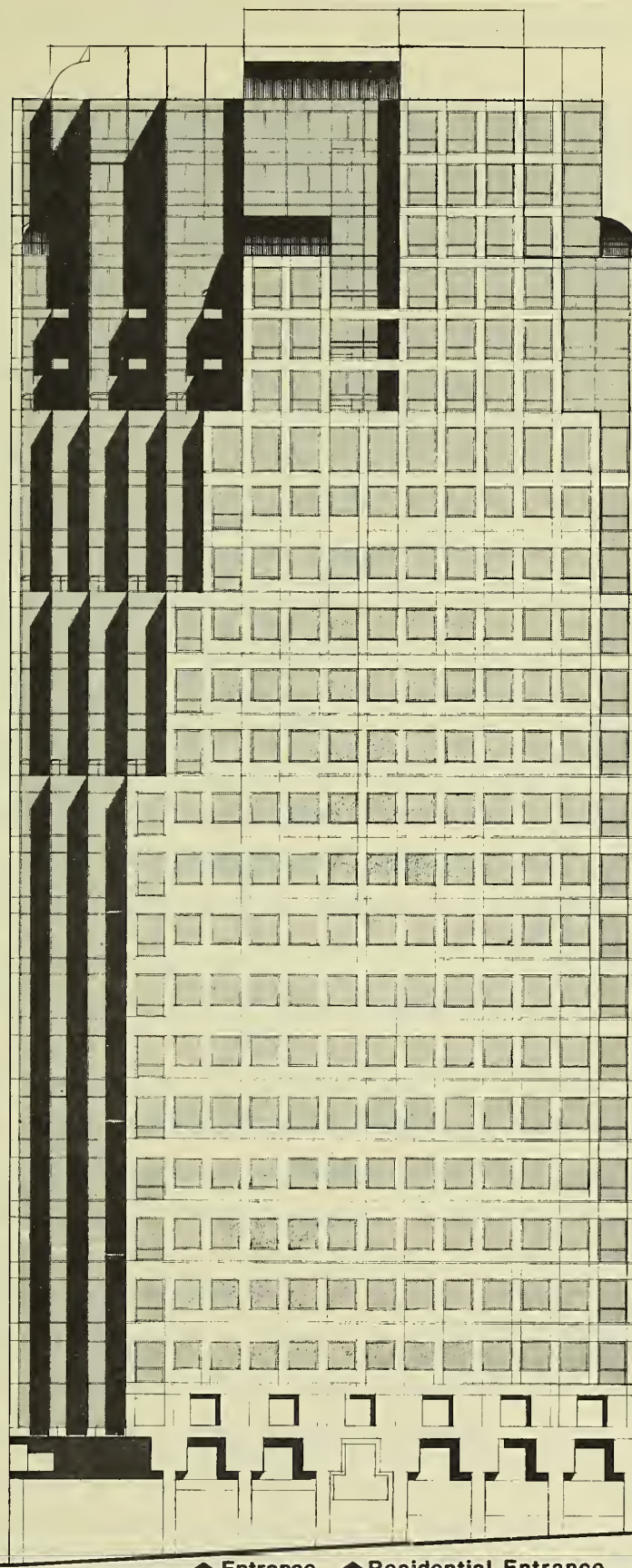






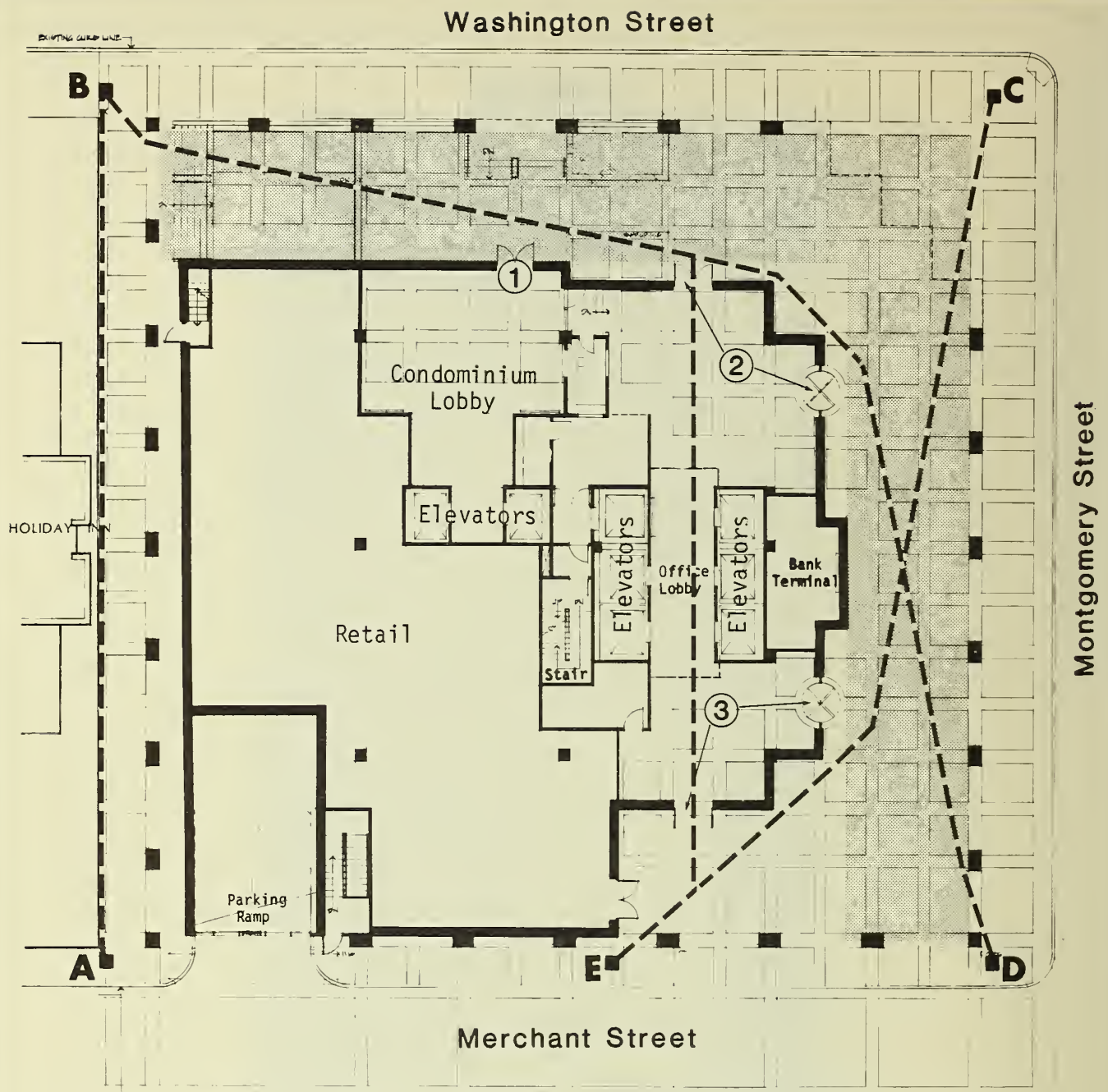
SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 10: Montgomery Street Elevation  
(East Elevation)



SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 11: Washington Street Elevation  
(North Elevation)



SOURCE: Kaplan/McLaughlin/Diaz

● FIGURE 11A: Requested Ground-Floor Bonus Features

## II. Project Description

- The use of bonuses, described in Section 126 of the City Planning Code, could permit space in addition to the Basic FAR. Permitted bonus space could be used for, and would be limited to, housing under the existing Interim Controls on downtown high-rise office development./1/ The project sponsor intends to request approximately 83,700 sq. ft. of bonus floor area. This bonus space would be based upon provision of multiple building entrances, shortened walking distances, sidewalk widening, a rooftop observation deck and parking access (see Tables 1 and 1A, pp. 26-26a). Requested ground-floor bonus features are shown in Figure 11A, p. 24a. Identified bonus space would result in a total gross floor area for the building of about 327,300 sq. ft., an FAR of about 18.8:1. The project proposes a total of 88,100 sq. ft. of residential space, about 4,400 sq. ft. more than the identified bonuses would allow. Because it would exceed the allowable FAR of 14:1 plus bonus space, it would not conform to the City Planning Code. Therefore, the City Planning Commission could not approve the project as proposed. An amendment to the City Planning Code, and possibly a change in the Interim Controls, would be required to allow approval of the project. There are a number of ways in which the Planning Code or Interim Controls could be modified to permit the amount of on-site housing proposed (see Section IV, Land Use, p. 46).

### D. PROJECT OCCUPANCY

The project sponsor proposes to lease approximately 4,000 sq. ft. of ground floor retail space, which is expected to accommodate about four tenants. Commercial retail activities may include uses such as a restaurant, apparel store, stationery store and/or travel agency. Ground-floor retail space would not include any financial institutions, although an automated banking terminal may be provided. Approximately 200,000 net sq. ft. of office space is expected to be leased to about 50 tenants. Tenants are expected to be lawyers, accountants, professional business service and financial service companies. The sponsor anticipates that most tenant firms would have a larger proportion of management and professional/technical staff than clerical staff. The project sponsor would manage and maintain the proposed building and service tenants through a permanent, full-time, on-site management team.

TABLE 1: PROJECT CHARACTERISTICS

NUMBER OF STORIES		HEIGHT AND BULK MEASUREMENTS		
Lobby/Retail	1		<u>Proposed</u>	<u>Permitted*</u>
Parking:	1	Height:	300 ft.	300 ft.
Office:	15	Length:	130 ft.	170 ft.
Mechanical:	1	Diagonal		
Residential:	<u>6</u>	Dimension:	180 ft.	200 ft.
Total Stories	24			

GROSS FLOOR AREA PROPOSED

<u>Office</u>	<u>sq. ft.</u>	<u>Residential</u>	<u>sq. ft.</u>
Office Lobby:	3,000	Residential Units:	78,500
Rest./Retail:	4,000	Health Club and Common Area	4,900
Office Space:	<u>236,600</u>	Residential Lobby:	1,300
		Residential Elevator Shaft:	<u>3,400</u>
<u>Total Office:</u>	243,600	<u>Total Residential:</u>	88,100

REQUESTED BONUS SPACE (Section 126 of the City Planning Code)

Multiple Building Entrances	12,200 sq. ft.
Sidewalk Widening	36,500 sq. ft.
Shortened Walking Distances	19,800 sq. ft.
Observation Deck	10,000 sq. ft.
Parking Access	<u>5,200 sq. ft.</u>
Total Bonus Floor Area	83,700 sq. ft.

FLOOR AREA CALCULATIONS

	<u>Floor Area</u>	<u>FAR</u>
Basic Permitted**	243,600 sq. ft.	14.0:1
Bonus Space Requested	83,700 sq. ft.	4.8:1
Total Permitted by Code	327,300 sq. ft.	18.8:1
Proposed Project	331,700 sq. ft.	19.1:1

\*Section 270 of the City Planning Code

\*\*Section 124 of the City Planning Code

SOURCE: Environmental Science Associates, Inc.

● TABLE 1A: BONUS CALCULATIONS

<u>Bonus Feature Requested</u>	<u>Sq. Ft. of Bonus Floor Area per Unit of Feature</u>	<u>Maximum For Bonus (Percent of Basic Gross Floor Area)</u>	<u>Requested Project Bonus</u>
MULTIPLE BUILDING ENTRANCES (three major entrances provided)	10,000	5	12,200 (maximum)
SIDEWALK WIDENING*	7	15	36,500 (maximum)
SHORTENED WALKING DISTANCE**	40	10	19,800
OBSERVATION DECK	10,000	Not Applicable	10,000
PARKING ACCESS***	100	5	<u>5,200</u>
TOTAL REQUESTED BONUS FLOOR AREA			83,700

\* Sidewalks would be widened 21.5 ft. on both Montgomery and Washington Sts. over a total distance of 245 ft.:  $21.5 \times 245 \times 7 = 36,872$ , which is greater than 15% of the Basic Gross Floor Area.

\*\*total shortened walking distance from Figure 8A would be 495 ft.

\*\*\*62 spaces - 10 spaces required by Code for residential use = 52 spaces

SOURCE: Kaplan/McLaughlin/Diaz

## II. Project Description

### E. PROJECT SCHEDULE, COST AND APPROVAL REQUIREMENTS

#### PROJECT SCHEDULE

Detailed project design is scheduled by the sponsor for completion in early 1982. Demolition and site clearance are anticipated to require approximately one month; excavation one month; foundation preparation four months; steel erection five months; and exterior and interior finishing nine months. Interior finishing would be completed within 18 months from the initiation of project construction. Initial project occupancy is scheduled for mid- to late 1984, with full occupancy expected in late 1984 or early 1985./2/

#### COST

● Project development costs would be about \$50 million in 1981 dollars, including \$10 million for land, \$1.3 million for design, engineering and environmental review, \$25 million for basic construction, \$3.5 million for interior finishing and \$10 million for interim financing and miscellaneous costs. Ground-floor retail space is expected to rent for approximately \$50 per sq. ft. per year. Office space is expected to rent for approximately \$35 per sq. ft. per year. Residential units are expected to sell for about \$300 per sq. ft., or from about \$312,000 to 607,500 in 1981 dollars./3/

#### APPROVAL REQUIREMENTS

Following a public hearing before the City Planning Commission, responses to all written and oral comments will be prepared, and this EIR will be revised as appropriate and presented to the City Planning Commission for certification, as to accuracy and completeness. No permits may be issued until the Final EIR is certified.

Because the project would exceed the allowable FAR of 14:1 plus identified bonus space, it would not conform to the City Planning Code. Therefore, the City Planning Commission could not approve the project as proposed. An amendment of the City Planning Code, and possibly a change in the Interim Controls, would be required to allow approval of the project.

The provisions of the City Planning Code are administered by the Zoning Administrator and other staff members of the Department of City Planning. The Zoning Administrator is responsible for recommending appropriate changes in the Code to the City Planning Commission. According to Section 302 of the Code, an amendment may be initiated by the Board of Supervisors or by a resolution of intention by the City Planning Commission. An interested property owner may not initiate changes in the text of the Code. The City Planning Commission is required to hold a hearing on any proposed amendment. Following a public hearing, the Planning Commission may approve an amendment if it finds that, "the public necessity, convenience and general welfare require the proposed amendment." Once approved by the City Planning Commission, a proposed amendment must be presented to the Board of Supervisors and the Board must adopt the amendment by a majority vote. The City Planning Commission could not act on approval of the proposed project until an amendment to the Planning Code, and possibly a change in the Interim Controls, allowing residential floor area in excess of the amount presently permitted under the Interim Controls, were approved by the Board of Supervisors. Possible modifications of the Code, and a change in the Interim Controls, to permit this project are discussed in Section IV, Land Use, p.46.

● Under its policy of Discretionary Review of all downtown high-rise buildings during the period of Interim Controls on the use of floor area bonuses, the City Planning Commission would review the building design and its environmental context in detail and after a public hearing would adopt a resolution approving, approving with conditions, or disapproving the project./1/ A Conditional Use authorization would be required by the Interim Controls to permit the use of bonus floor area for residential use on the site. According to Section 134 of the City Planning Code, a 25% rear yard (i.e. 25% of lot depth) would be required at the first residential level and for each succeeding residential level in this C district. The project as proposed would require a Variance from this requirement as described in Section 305 of the Code. Following project approval by the City Planning Commission, the project sponsor would obtain demolition, building, and related permits from the Central Permit Bureau of the Department of Public Works. Under the State Subdivision Map Act and the City Subdivision Code, preparation and approval of a subdivision map would be required for the proposed residential development.

## II. Project Description

### NOTES - Project Description

/1/ City Planning Commission Resolution No. 8474, January 17, 1980. Board of Supervisors Ordinance 240-80, June 1, 1980, established the interim limitations on use of bonuses in effect until July 1, 1981. This ordinance was extended, in June 1981, until September 1, 1981 and, subsequently, until March 4, 1982.

/2/ Patrick Gilligan, Crow-Spieker Companies, oral communication, August 24, 1981

● /3/ Patrick Gilligan, Crow-Spieker Companies, oral communication, December 30, 1981 and Kevin Cox, Kaplan/McLaughlin/Diaz, oral communication, December 31, 1981.

III. ENVIRONMENTAL SETTING

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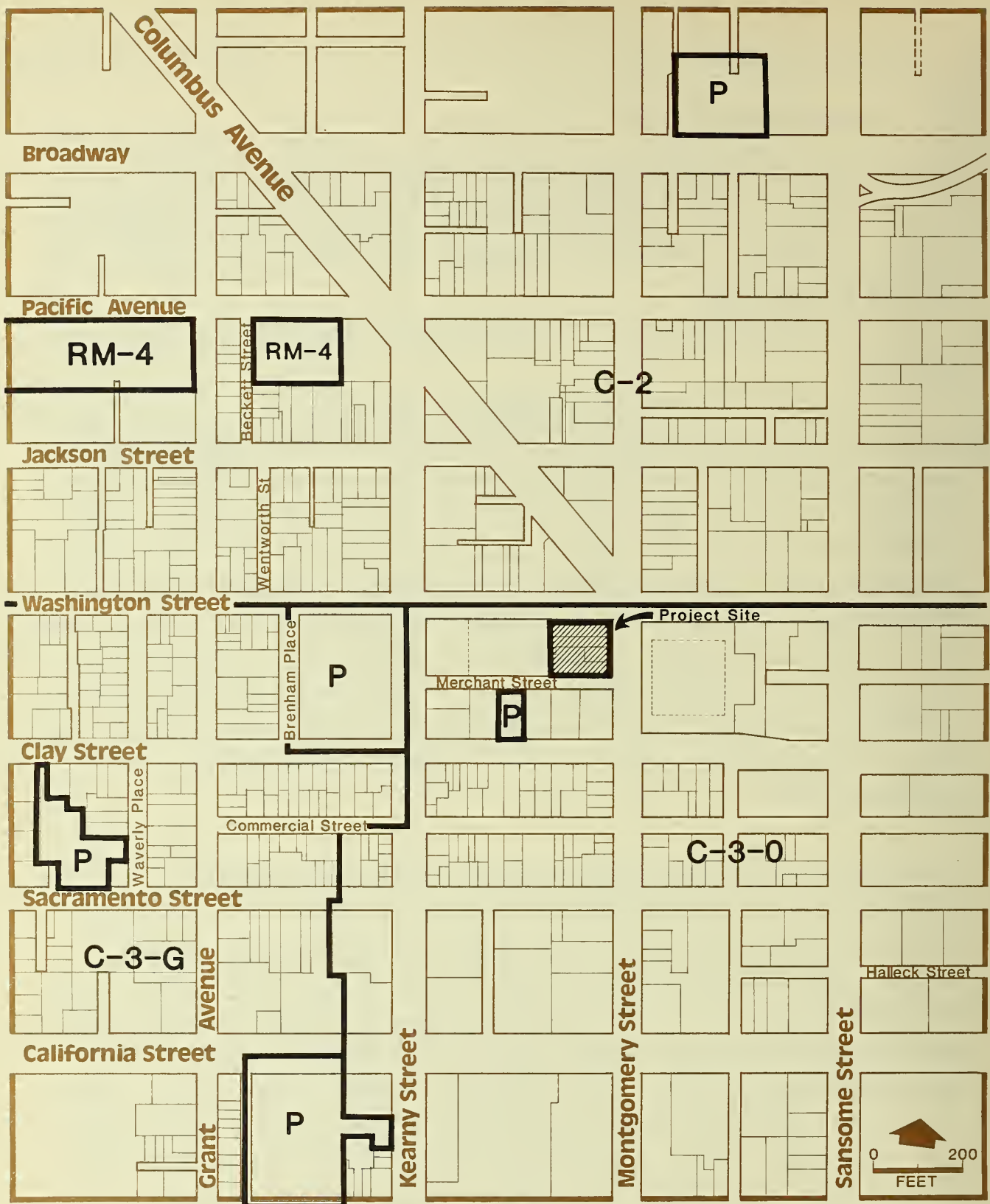
A. LAND USE AND ZONING

## LAND USE

- The site is within the northern border of the City's C-3-0 (Downtown Office) zoning district and is surrounded by several districts with differing land-use characteristics (see Figure 12). San Francisco's Financial District, which became known as the "Wall Street of the West" during the 1930's, lies south of the project site. The Financial District contains a combination of early 20th-century banking and office facilities, and most of the City's more recent high-rise office development. The 850-ft. Transamerica Pyramid (FAR of about 9.4:1) and 280-ft. 601 Montgomery St. (FAR of about 16.5:1) high-rise office buildings are located immediately east and south, respectively, of the project site. The Holiday Inn, directly west of the site is about 300 ft. tall (FAR of about 9.7:1).

The smaller-scaled Jackson Square Historic District, which includes restaurants, bars, antique shops and professional offices, lies immediately north and northeast of the site (see Figure 1, p.12). Buildings in the Jackson Square Historic District in the site vicinity are two to four stories in height and many are in office use with ground floor retail establishments, such as the office supply company located at 1 Columbus Ave. and the lunch shop at 700 Montgomery St. The residential Telegraph Hill District is north of the site beyond the Broadway entertainment strip. The North Beach area, with restaurants, bars and cafes, continues the scale of the Jackson Square Historic District northwest of the site. Directly west of the site, residential and commercial land uses are intermixed to form the Chinatown community. Embarcadero Center is to the southeast.

- The site lies between Chinatown and Embarcadero Center; Washington St. serves as a pedestrian corridor between these two areas. The Holiday Inn, on Lot 24



**FIGURE 12: Planning Code Use Districts**

SOURCE: Department of City Planning, S.F.

of Assessor's Block 208, is directly west of the site. The Holiday Inn was constructed in 1972 under the condition that portions of its lobby serve as a Chinese Cultural Center. A pedestrian bridge extends from the Holiday Inn over Kearny St. into Portsmouth Square, making that building accessible to the community to the west. As a condition of approval, doors were required to be provided on the east side of the Holiday Inn. These doors were to allow a direct connection between the Holiday Inn and a structure built on the project site to promote pedestrian circulation between Chinatown and the Financial District, within a Portsmouth Square Corridor.

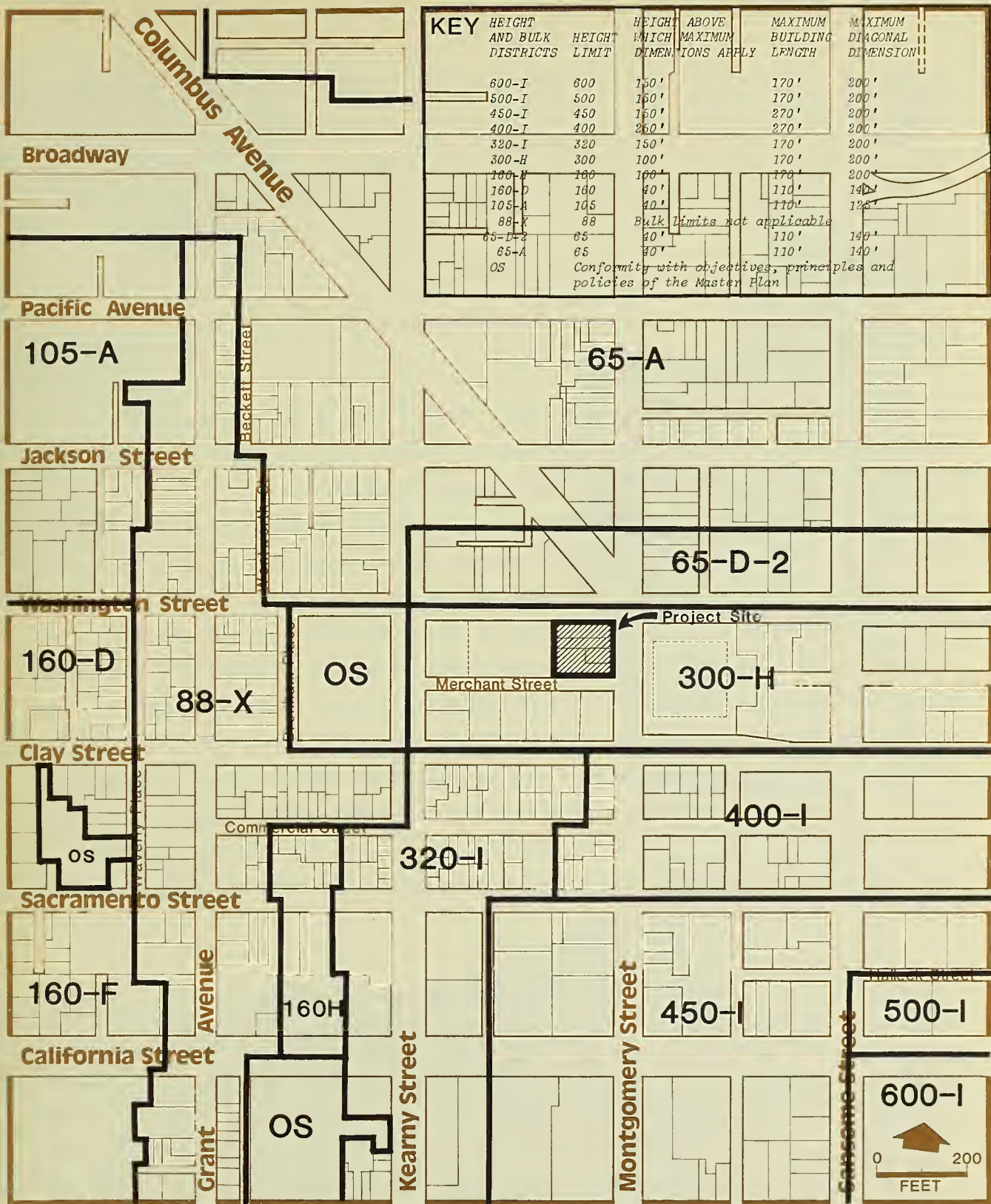
- The four parcels comprising the project site are owned or controlled by the project sponsor. Lot 25, at the corner of Washington and Montgomery Sts., formerly in City ownership, was purchased by the project sponsor at a public auction on November 17, 1981. Lot 25 was originally part of six separate lots which were acquired by the City's Department of Public Works (DPW). Portions of the land were used to widen Washington St.; the remainder was subsequently declared to be surplus by DPW. Lot 25 is presently vacant, partially excavated and covered with debris, grass and weeds.

The site is in the 300-H Height and Bulk District (see Figure 13). Above a height of 100 ft. the maximum permitted building length is 170 ft. and the maximum permitted diagonal dimension is 200 ft. The maximum permitted building height is 300 ft. The site is in the Garment Shop Special Use District as defined in Section 236 of the City Planning Code.

- The site is located immediately south and southwest of the Jackson Square Historic District. The area north of the project site is located in the C-2 zoning district with a Basic FAR of 3.6:1 and a height limit of 65 ft. (see Figures 12 and 13, pp. 31 and 33). The southern part of the Jackson Square Historic District is classified as a 'special exception' height zone, according to Section 263.1 of the City Planning Code. In this 65-D-2 height and bulk district, "height exceptions may be approved by the City Planning Commission in appropriate cases, up to but not to exceed a height of 200 ft." This zoning designation allows the southern edge of Jackson Square to serve as a transitional height zone, to produce a stepping down of height from the

Downtown Office district to the smaller structures in the Jackson Square and Telegraph Hill areas. The 108-ft. Pacific Lumber Company Building presently under construction on the corner of Washington and Sansome Sts., is an example of the transition which may be provided by this particular height district (see Figure 2, p.13).

- There are a number of other buildings proposed or approved within three blocks of the project site. The proposed Bank of Canton building, which would contain about 19 floors of office space, would be located one block south of the site at Montgomery and Clay Sts. and a 24-story office building has been approved at 456 Montgomery St. (see Figure 2, p.13). A seven-story office building is proposed at the corner of Washington and Battery Sts., two blocks east of the site, and the 25-story DAON office building, at Battery and Sacramento Sts., about three blocks southwest of the site, is currently under construction. A five story office building has been proposed on the corner of Pacific and Columbus Aves., two blocks northwest of the site and a two- to five-story office building has been proposed on the corner of Pacific Ave. and Montgomery St., two blocks north of the site. Development of the block bounded by Washington, Kearny, and Jackson Sts. and Columbus Ave. is under consideration by a number of property owners. The so-called International Hotel project, presently in the preliminary stage of design, may involve a combination of office and residential use on several parcels of this block (Eva Levine, Department of City Planning, telephone communication, January 15, 1982).



## Legend



Project Location

FIGURE 13: Planning Code Height and Bulk Districts

Source: Department of City Planning, S.F.

#### B. URBAN DESIGN

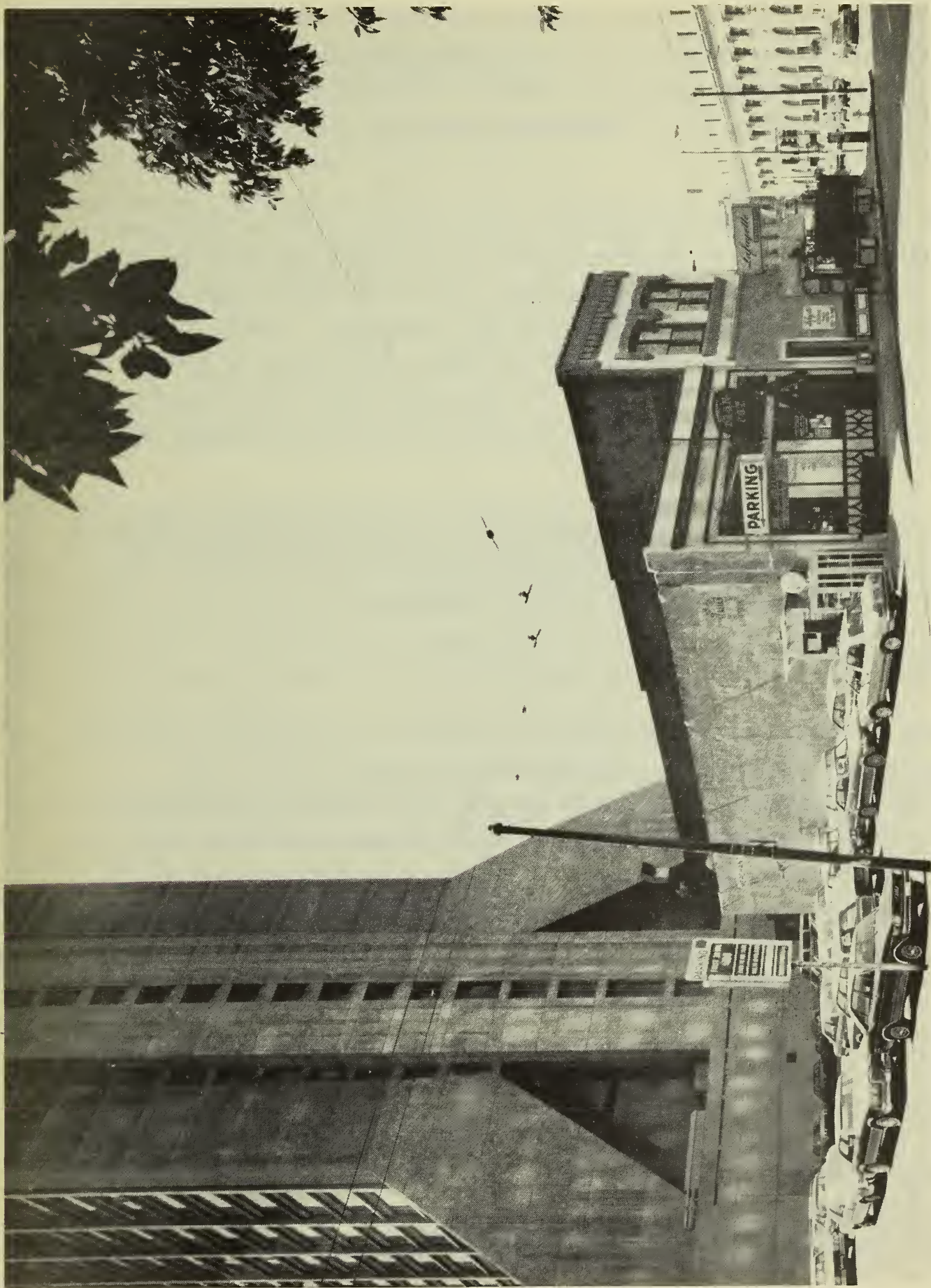
##### VISUAL ASPECTS

The project site, occupied by a surface parking lot, a one-story and a two-story brick structure, and a fenced-in vacant lot, is generally level and contains no landscaping or distinct topographic features.

The structures front on Montgomery St. and provide a visual focus when the site is viewed from the east. From nearby locations to the south, views of the site are oriented towards the parking lot and the blank walls of the existing buildings, and extend through or over the site (see Figure 14). Views from the north include the wooden fence along the frontage of the vacant lot. The blank wall of the existing 2-story building, containing two billboards, projects above the fence; the 19-story 601 Montgomery St. office building rises behind and south of the buildings on the site. The neighboring 27-story Holiday Inn obstructs views of the site from nearby locations to the west. The blank concrete wall of the Holiday Inn and the 601 Montgomery St. building serve as a visual background and dominate the site from most locations to the north and east.

Two parcels of the site are open, the parking lot and vacant parcel. The small size and the coloring of the site's brick buildings may be considered a visual amenity to the pedestrian. The blank walls of the Holiday Inn and on-site structures dominate views of the site, however, and do not promote visual interest. The site is a break in the continuous Montgomery St. building wall.

The site is in a transitional area between the tall, modern buildings of the Financial District and the small-scale, older structures of the Jackson Square



SOURCE: Environmental Science Associates, Inc.

FIGURE 14: View of Existing Site

Historic District. Adjacent to the site on the east is the 850 ft. Transamerica Pyramid. The 601 Montgomery St. building, south of the site, is about 280 ft. tall. North of the site, structures of two to four stories predominate.

The existing structures are generally not visible beyond the buildings and street segments in the immediate vicinity. The project site is not visible from long-range view points to the south, such as Twin Peaks or Potrero Hill, due to the presence of intervening high-rise structures. The site is visually prominent from locations to the north and west. The absence of a sizeable building on the site currently permits views of the lower portions of the Transamerica Pyramid and the 601 Montgomery St. building from the west and north, respectively.

There are no long-range views of San Francisco Bay or the City available from the existing buildings on the site. Short-range views of the Jackson Square and North Beach districts are visible from the site.

#### SHADOW

Light and shadow patterns on streets and sidewalks in the project vicinity are cast primarily by nearby existing high-rise structures. The buildings producing major existing shadows in the area include the 601 Montgomery St. building, the Holiday Inn and the Transamerica Pyramid (see Figures 22-24, pp. 64-66).

#### WIND

Wind conditions in San Francisco are a determinant of pedestrian comfort on sidewalks and in other public areas. Northwesterly and westerly winds are the most frequent and strongest winds during all seasons in San Francisco. (In meteorology, a west wind blows from the west.) In general, wind frequencies and speeds are highest in the summer when winds blow from the northwest 12% to 39% of the time, exceeding 13 miles per hour (mph) 35% of the time and 25 mph 3% of the time. During the summer, winds blow from the west 15% to 40% of the time, exceeding 13 mph 29% of the time and 25 mph 7% of the time.

## C. EMPLOYMENT, HOUSING AND FISCAL FACTORS

### LOCAL AND REGIONAL COMMERCIAL SPACE AND EMPLOYMENT

San Francisco is the major office center in the Bay Area, with approximately 63 million gross sq. ft. of office space./1/ During the 1970's, space in downtown office buildings was added at a rate of about 1.7 million sq. ft. per year; approximately 32.4 million sq. ft. were constructed between 1960 and 1981 (see Appendix C, Table C-1, p. 266). An additional 5.6 million sq. ft. of office space will be added when the buildings under construction (as of November 1981) are finished and another 3.1 million sq. ft. of office space has been approved but has not yet begun construction (as of November 1981).

The largest employment growth in the Bay Area from 1970 to 1978 occurred in the office sector, with over 60% of the regional increase in total work force. A total of 1.2 million people in 1978 held office jobs in the Bay Area, with nearly 70% employed by firms serving the local population. Over 55% of the 280,000 office workers employed in San Francisco worked for employers such as national or regional headquarters which serve a wider geographical area./2/

In early 1981, annual rents in the newer downtown office buildings ranged from about \$24 to \$35 per sq. ft. Office space in the buildings that will go on the market in 1984 is expected to command annual rents of between \$35 and \$50 per sq. ft. In May 1980, the vacancy rate in downtown office buildings, was estimated to be one-tenth of 1% according to a real estate survey./3/ Low vacancy rates coupled with rapidly growing rents suggest that the supply of new office space in San Francisco has not kept pace with demand.

With the apparent shortage of office space in San Francisco as one factor some potential users of San Francisco office space have located elsewhere. While the City houses 60% of the region's office space, 56% of the new construction, based on building permit value, took place outside the City from 1972-1979./4/ Cheaper space in outlying areas attracts companies that do not need a downtown San Francisco location or can shift their support functions out of the City. For example, approximately nine million sq. ft. of new

office space is under construction or planned in the next ten years in major projects in San Mateo County. Office space construction in Contra Costa County is averaging one million sq. ft. a year. Annual rents for new office space in both of these areas average from about \$15 to \$18 per sq. ft. It has been estimated that in San Francisco the annual tax cost to the employer in a 400-person office is \$305.29 per employee while in Concord the cost per employee is \$47.24. /5/

#### EMPLOYMENT AND TENANT MIX AT THE PROJECT SITE

Businesses at the project site employ 13 persons. Tenants include two restaurants employing 10 persons, an architect's office, photographer's studio, and a parking lot attended by one employee.

#### HOUSING

A description of regional and San Francisco housing characteristics is included in the Five Fremont Center, Final EIR (EE.80.268, Certification Date March 12, 1981), pp. 37-44. This report is available for public review at the Office of Environmental Review, 45 Hyde St., Room 319, and is hereby incorporated by reference into this EIR pursuant to California Environmental Quality Act (CEQA) guidelines, California Administrative Code, Title 14, Section 15140. Information on the housing stock includes amount, growth factors, vacancy rates and purchase and rental costs. Both regional and San Francisco housing stock are characterized by low growth, low vacancy rates and high purchase and rental costs in relation to typical wages paid. These factors combined have tended to constrict the supply and affordability of housing in San Francisco.

#### FISCAL FACTORS

Lot 25, which is vacant, is owned by the City and County of San Francisco and is exempt from taxation. The assessed value of the three privately owned properties in fiscal year 1980-81 is \$1,124,000. At the 1980-81 property tax rate of \$4.92 per \$100 assessed valuation, the property yielded about \$55,300 in property tax revenues, distributed as shown in Table 2.

General fund revenues to the City and County of San Francisco from the non-BART sales tax, payroll tax, gross receipts tax, and non-bond property tax, will total about \$46,570 from the site in 1981. These revenues are paid into the City's general fund.

The City incurs costs in serving the existing buildings. Police, fire, and general government expenditures are supported primarily by the General Fund. Most street maintenance, street improvement, and traffic control costs are supported by other revenue sources such as fees, fines, and federal and state aid.

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TABLE 2: DISTRIBUTION OF PROPERTY TAX REVENUES FROM PROJECT SITE IN 1980-81

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<u>Agency</u>	<u>Ad Valorem Tax Rate</u>	<u>Percent</u>	<u>Revenues*</u>
City and County of S.F.	\$4.162	84.6	\$47,780
S.F. Unified School District	0.343	7.0	3,860
S.F. Community College District	0.057	1.1	640
Bay Area Air Quality Management District	0.008	0.2	100
BART	<u>0.348</u>	<u>7.1</u>	<u>3,920</u>
TOTAL	4.920	100.0	\$55,300

\* Based on assessed valuation of \$1,124,000 and the 1980-81 composite tax rate of \$4.92 per \$100 of assessed valuation.

SOURCE: San Francisco Controller's Office

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NOTES - Employment, Housing, and Fiscal Factors

/1/ San Francisco Department of City Planning, May 1, 1981, Statistical Update on Citywide Office Development.

/2/ Association of Bay Area Governments (ABAG) and Bay Area Council, December 1979, San Francisco Bay Area Economic Profile.

/3/ San Francisco Examiner, "Effects of S.F. Office Space Squeeze", January 18, 1981, report on a real estate conference sponsored by Coldwell Banker.

/4/ Association of Bay Area Governments (ABAG), April 1981, Bay Area Office Growth, Working Papers on the Region's Economy, Number One.

/5/ San Francisco Examiner, "B of A Quake Hazard Alibi Causes a Political Quake", June 15, 1981.

#### D. TRANSPORATION, CIRCULATION AND PARKING

##### STREET AND FREEWAY SYSTEM

The site is served by local streets and by portions of the regional freeway system (see Figure 1, p.12, and Figure 16, p.43). Access to the freeways connecting with the East Bay, San Francisco Airport and the Peninsula is provided by pairs of ramps about 1,500 ft. to the east (Washington and Clay Sts. at Davis St.), and about 1,500 ft. to the northeast (Broadway at Sansome and Battery Sts.).

The site is within the short-term Parking Belt on the fringe of the Downtown Core automobile control area, as designated in the Downtown Transportation Plan of the Transportation Element of the San Francisco Comprehensive Plan./1/ The Parking Belt area is described in the Plan as, "areas appropriate for short-term parking facilities to replace spaces removed from the core area; located and designed to intercept vehicles entering downtown from major thoroughfares before they reach the Downtown Core automobile control area."

In the vicinity of the project site, Columbus Ave., and Montgomery, Kearny, Sansome, and Clay Sts. are designated transit arterial streets in the Downtown Transportation Plan. Washington St., Clay St., Columbus Ave. and Montgomery St. are designated major thoroughfares on the Thoroughfares Plan./1/ Columbus Ave., Kearny St. and Montgomery St. are designated transit streets in the Mass Transit Plan.

The intersections of Washington and Kearny Sts., Washington St. and Columbus Ave. and Montgomery St., Clay and Kearny Sts. and Clay and Montgomery Sts. are controlled by traffic signals. The signals operate on a pretimed basis with peak and off-peak green-time allocations.

#### PARKING

- A survey analysis of existing long-term (greater than six hours), commercially available off-street parking in the Downtown area north of Market St. was conducted (see Figure 15).<sup>2/</sup> This area corresponds to a maximum walking distance of 2,000 ft. (about five blocks) from the project site. In this area, there are a total of 13,340 long-term, commercially available off-street spaces, of which 560 were vacant on a daily basis at the time the survey was conducted. This is equivalent to an average occupancy of approximately 96%. Approximately 87% of the vacant spaces were more than 500 ft. from the project site. Residential areas in the site vicinity, including Nob Hill and Telegraph Hill have preferential parking for residential use.

#### TRANSIT SERVICE

Two Muni motor coach lines, the 15 and 41, run along Montgomery St. adjacent to the site and stop on corners at the intersection of Washington and Montgomery Sts. with Columbus Ave. (see Figure 16, p.43). Muni Metro light rail vehicle lines are accessible via the Embarcadero Station (about 2,200 ft. southeast of the project site) and the Montgomery Station (about 2,400 ft. south of the project site) of the Market St. Subway. Regional service is provided to the East Bay by the Bay Area Rapid Transit District (BART) from the Embarcadero and Montgomery Stations, and by A-C Transit motor coaches from the Transbay Transit Terminal located on Mission St., about 3,500 ft. southeast of the project site.

Service to the Peninsula is provided by the Southern Pacific Transportation Company (SP) from a train terminal at Fourth and Townsend Sts.; by the San Mateo County Transit District (SamTrans), which has bus routes and stops along various streets in the area, primarily on Mission St. west of First St., and by BART, which effects transfers to SamTrans routes at the Daly City Station.



**FIGURE 15: Parking Locations  
in Survey Area**

**SOURCE: TJKM, Transportation Consultants**

**LEGEND**

Study Area Boundary

Off-Street Commercial Parking



### III. Environmental Setting

The Golden Gate Bridge Highway and Transportation District (Golden Gate Transit) provides peak-period bus service to Marin and Sonoma counties from stops on Pine and Sansome Sts. Golden Gate Transit provides ferry service to terminals in Larkspur and Sausalito from the Ferry Building southeast of the site.

Although not traditionally considered transit, car pooling is becoming a substantial form of para-transit. Golden Gate Transit operates a van pooling program to North Bay areas; there are currently about 70 van pools commuting to San Francisco from Marin and Sonoma Counties, most of which commute to the Financial District./3/ The RIDES car pooling program, operated by a nonprofit, publicly funded corporation, provides consulting and matching services to help establish Bay Area car and van pools.

#### NOTES - Transportation, Circulation and Parking

/1/ San Francisco City Planning Commission, Resolution 6834, April 27, 1972, Comprehensive Plan, Transportation Element.

/2/ The parking inventory survey was conducted by TJKM on Tues.-Fri. and Mon. January 20-23, 26, 1981 and Mon.-Wed. July 20-22, 1981.

/3/ Robert Crowel, Golden Gate Transit, oral communication, October 29, 1981.

#### E. AIR QUALITY

The Bay Area Air Quality Management District (BAAQMD) operates an air quality monitoring station approximately 1.25 miles southwest of the site. A three-year summary of the data collected at this station and the corresponding ambient air quality standards are shown in Appendix E, p. 278. These data show that the San Francisco area experiences rare violations of State standards for ozone, carbon monoxide (CO), total suspended particulate (TSP), and nitrogen dioxide (NO<sub>2</sub>).

A description of San Francisco air quality characteristics is included in the Five Fremont Center, Final EIR (EE. 80.268), p. 58-9 and Appendix D, p. 258. The report is available for public review at the Office of Environmental Review, 45 Hyde St., Room 319, and is incorporated by reference into this EIR.

#### F. NOISE

As is typical of Downtown San Francisco, the noise environment of the site is dominated by vehicular traffic noise. The Environmental Protection Element of the Comprehensive Plan indicates an existing day-night average noise level (Ldn) of 65 dBA on Washington St. and 70 dBA on Montgomery St./1,2/

#### NOTES - Noise

/1/ Decibel (dB) is a logarithmic unit of sound energy intensity. Sound waves, traveling outward from a source, exert a force known as a sound pressure level (commonly called "sound level"), measured in decibels. dBA is decibel corrected for the variation in frequency response of the typical human ear at commonly-encountered noise levels.

/2/ Ldn is an averaged sound level measurement, based on human reaction to cumulative noise exposure over a 24-hour period, which takes into account the greater annoyance of nighttime noises. Noise between 10 P.M. and 7A.M. is weighted 10 dBA higher than daytime noise.

#### G. ENERGY

Existing energy consumption on the project site is associated with the 5,200 sq. ft. of restaurant space and 3,300 sq. ft. of office space. Existing structures were built before present State energy standards and are probably less energy efficient, on a per-sq.-ft. basis, than modern structures built to current standards.

IV. ENVIRONMENTAL IMPACT

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An Initial Study of the proposed project was published September 25, 1981, and a determination was made that an Environmental Impact Report was required. Issues which were considered to require no further discussion as a result of the Initial Study include: land use compatibility, operational noise, public services and utilities, biology, cultural and historic factors, geology and soils, and safety and health hazards. Therefore, this EIR does not discuss the above issues. The Initial Study is incorporated herein as Appendix A, p. 214, and may be referred to for a discussion of these issues.

A. LAND USE AND ZONING

The project would respond to general objectives of the San Francisco Comprehensive Plan, and to the objective stated in Article 2, Section 210.3 of the City Planning Code, that the C-3-0, Downtown Office District play a leading national role in finance, corporate headquarters and service industries, and serve as an employment center for the region. The project would comply with Objective 6 of the Commerce and Industry Element of the Comprehensive Plan by maintaining and improving San Francisco's position as "a prime location for financial, administrative, corporate and professional activity," and would be consistent with Policy 2 of that objective in contributing to the maintenance of a compact downtown core.

- The 300-ft.-project tower would be the maximum height permitted in the 300-H Height and Bulk District. The building length would be about 130 ft., 40 ft. less than the permitted maximum of 170 ft. and 8 ft. less than the site length of about 138 ft. The diagonal dimension of 180 ft. would be about 20 ft. less than the maximum of 200 ft. and 8 ft. less than the site diagonal dimension of about 188 ft. According to Section 134 of the City Planning Code, a 25% rear yard (i.e. 25% of lot depth) would be required at the first residential level

and for each succeeding residential level in this C district. The project as proposed would require a Variance from this requirement as described in Section 305 of the Code.

The parking area would provide 62 parking spaces (about 25,000 sq. ft.) and two freight loading spaces (3,300 sq. ft.) within the building's enclosed one-level-plus-mezzanine parking facility. About 17,000 sq. ft. of this space, seven percent of the gross office floor area (about 42 spaces), would

be accessory parking, as described in Section 204.5 of the City Planning Code, for the office portion of the building. Fifteen spaces, or about 6,000 sq. ft., would be allocated to the residential units as 150% of the residential parking requirement in the C-3 District. The project sponsor would apply for a Conditional Use authorization to permit the remaining 2,000 sq. ft. of additional parking space (about five spaces) for the residential units pursuant to Section 157 of the City Planning Code.

Gross floor area of the office lobby, retail, restaurant and office space would be approximately 243,600 sq. ft., a Floor Area Ratio (FAR) of about 14:1. The project would have about 40 residential condominium units, with a total of about 90 bedrooms; that is, these would tend to be family or shared units rather than studios. The square footage of the proposed residential units would cause the building to exceed the 14:1 Basic FAR for a structure in the C-3-0 district. The project would include 88,100 gross sq. ft. of housing. The total gross floor area for the building would be approximately 331,700 sq. ft. (excluding cellular foundation, mechanical, and parking floor area), representing an FAR of about 19.1:1.

The use of bonuses, described in Section 126 of the City Planning Code, would permit space in addition to the Basic FAR. Permitted bonus space could be used for, and would be limited to, housing under the Interim Controls on downtown high-rise office development (Municipal Ordinance No. 240-80, effective July 1, 1980). The project sponsor intends to request approximately 83,700 sq. ft. of bonus floor area (see Table 1, p. 26). Identified bonus space would result in a total gross floor area of about 327,300 sq. ft., an FAR of about 18.8:1. The project proposes a total of about 88,100 sq. ft. of residential floor area, about 4,400 sq. ft. more than the identified bonuses would allow.

- Because the project would exceed the allowable FAR of 14:1 plus identified bonus space, it would not conform to the City Planning Code. Therefore, the City Planning Commission could not approve the project as proposed. An amendment to the City Planning Code, and possibly a change in the Interim Controls, would be required to allow approval of the project.

There are several ways in which the Planning Code could be modified to permit the area of on-site housing proposed. The project could be approved by modification of Section 304 of the Planning Code concerning Planned Unit Development provisions. First, a subsection could be added to Section 304 to allow buildings in C-3 Districts that provide on-site housing to qualify for PUD status and for the housing floor area (but not the commercial space) to exceed the FAR limitations of Section 124 of the Code. Alternatively, Section 304(b) could be modified to reduce the minimum site size necessary in the definition of a PUD project. If the minimum site size were reduced from 1/2 to 1/3 of an acre, the project could be defined as a potential PUD, and the proposed additional floor area could be approved by the Conditional Use procedures outlined in Section 303 of the Code. To preclude increased density for office uses, Section 304 (b) could be modified to allow the approval of additional floor area for residential uses only, on sites smaller than 1/2 acre. A third way the Planning Code could be modified to allow approval of the project would be to amend Section 126(b) which describes development bonuses in C-3 Districts. A separate floor area bonus could be provided as subsection 126(b)(11) for buildings in the C-3 Districts which include on-site housing. Were Section 126 to be amended, corresponding changes in the Interim Controls for the Downtown also would be required to allow the new floor area bonus.

An amendment to the City Planning Code which could allow the amount of on-site housing proposed for the project would have an impact on subsequent development in the C-3 District. Such a modification to the Code would encourage the provision of additional on-site housing in future high-rise development. Larger buildings than are presently permitted would be possible on sites of less than 1/2 acre; such small sites do not presently qualify as Planned Unit Developments under Section 304 of the Code. It is likely that such an amendment to the Planning Code would result in buildings which exceed the maximum FAR and height recommendations contained in the Department of City Planning document Guiding Downtown Development. It is not possible to determine the exact location, size, or number of buildings which might be proposed as a result of such a change in the Planning Code. Modification of the Planning Code to allow approval of the project would generally encourage more housing units in the C-3 District. An increase in housing would result

in greater development of residential retail facilities and domestic conveniences, as well as greater 24-hour activity, in the Downtown.

- Through the provision of pedestrian amenities and about 4,900 sq. ft. of recreational and common area in the residential portion, the proposed project would comply with Policy 4 of Objective 6 of the Commerce and Industry Element of the Comprehensive Plan by providing adequate "amenities for those who live, work and use Downtown." The project would include about 8,250 gross sq. ft. of common and private open space for project residents including 750 sq. ft. of public open space and would comply with the open space requirement for residential use in the C-3 District (Section 135 (d) of the City Planning Code).

Through the provision of 40 residential dwelling units, the proposed project would comply with Objective 2 of Policy 2 of the Residence Element of the Comprehensive Plan which recommends "multiple-residential development in conjunction with commercial uses in the Downtown commercial area."

By providing on-site housing, the proposed project would introduce housing into the northern edge of the Financial District. The Chinatown community, one block west of the site, and the Golden Gateway Terrace apartment complex, three blocks to the east, would provide neighborhood retail facilities and domestic conveniences near the site. Eventually, residential services may be established within the immediate vicinity as the amount of residential land use in the downtown district increases.

- In 1967 the City Planning Commission instituted a policy of reviewing, under its discretionary powers, all applications for new buildings in the "Portsmouth Corridor," an area bounded by Kearny, Washington, Davis and Clay St., "with particular attention to the effects of any such buildings upon views to be created or blocked."/1/ As a condition of approval, it was required that the Holiday Inn be oriented in an east-west direction and be set back from Washington and Merchant Sts. above its base to preserve views within the Portsmouth Corridor. Because of view blockage by the Holiday Inn, west of the project, and the Transamerica Pyramid and Alcoa Building to the east, the proposed project would not obstruct any long range views from the "Portsmouth Corridor."

- The project site includes a 4,820-sq.-ft. parcel (Lot 25), formerly in City ownership. When this parcel was declared surplus by the Department of Public Works, it was reviewed by other City agencies and identified as potential open space in a report prepared by the Recreation and Park Commission (RPC).<sup>2/</sup> Lot 25 was designated a potential open space site in the Recreation and Open Space Element of the Comprehensive Plan (Amendment No. 7-8-75, January 4, 1978) and examined for development as a downtown mini park. The RPC subsequently determined that this parcel was not appropriate for such use because of its size and the shading caused on the parcel by nearby buildings. On April 9, 1981 the RPC recommended to the City Planning Commission that the designation of the parcel as a potential open space site be removed and the parcel be offered for sale to the public (RPC Resolution No. 12456). The RPC further recommended that a portion of the proceeds from the sale of the property be deposited in the City's Open Space account to be used to develop, redevelop or otherwise improve open space resources within the Chinatown community. Policy 3 of the Neighborhood Objective Section of the Recreation and Open Space Element of the Comprehensive Plan, which recognizes the Chinatown community as a "high need" recreational area, states as policy to "give priority for recreational improvements to high need neighborhoods."
- The City Planning Commission and the RPC had a joint meeting on July 7, 1981 to review the status of Lot 25. At that time, the RPC voted to remove the potential open space designation. The City Planning Commission voted, by motion, on July 16, 1981 to remove the potential open space designation of the parcel, thereby deleting the property from the Recreation and Open Space Element of the Comprehensive Plan. On September 14, 1981 the Board of Supervisors voted to authorize the sale of Lot 25 and directed that proceeds from the sale be reserved until further review and action by the Board. The Board indicated the intention "to use at least that portion of the proceeds which represents the difference between the actual acquisition cost of the property and the sale price for street maintenance, alley-way improvements and purchase of land for open space purposes in Chinatown."<sup>3/</sup> The project sponsor purchased Lot 25 at a public auction on November 17, 1981.

Guiding Downtown Development. In May 1981, the Department of City Planning published Guiding Downtown Development (GDD), a report containing a series of regulatory proposals for managing development in downtown San Francisco. (See Section VII, for an Alternative conforming with the recommendations contained in GDD.) GDD recommends that the Basic FAR for the project site be changed from 14:1 to 12:1, with an additional FAR of 5:1 allowable for residential uses. The allowable height would be reduced from 300 ft. to 250 ft. The gross commercial floor area of the project would exceed the GDD recommended FAR of 12:1 by 2:1. The 5.1:1 FAR proposed for housing would exceed the GDD allowable maximum FAR for on-site housing of 5:1 by 0.1. At a total FAR of 19.1:1, the project would exceed the GDD maximum FAR of 17:1 by 2.1:1. GDD recommends that the average floor area of floors above the midpoint of the building height be about two-fifteenths less than the average floor area of floors below the midpoint. The sculptured upper-level setbacks of the project would conform to this provision. At 300 ft., the project would exceed the 250 ft. GDD height by 50 ft. No increase in height for residential uses would be permitted by GDD in 250-ft. height districts.

- The project would include ground-floor retail space, encouraged by GDD. Public works of art, valued at 1% of construction costs, are recommended in GDD, and art work would be provided at the ground level of the project; its cost has not yet been determined. GDD policies suggest that one sq. ft. of public open space be provided for every 25 sq. ft. of gross building floor area. If this guideline were applied to the entire structure, including residential space, the recommended amount of open space would be about 13,200 sq. ft., or about 75% of the site area. If applied to the commercial portion of the building only, the recommended amount of open space would be about 9,700 sq. ft. The project as proposed would have an open pedestrian way outside the building containing approximately 6,600 sq. ft. as public space. It would also contain about 8,250 gross sq. ft. of common and private open space for use by project residents.

GDD recommends that 640 sq. ft. of housing be constructed for each 1,000 sq. ft. of office space. This would total about 168,500 sq. ft. of housing (about 200 units) for the project. If the maximum amount of office space were provided, for an FAR of 12:1, GDD would not permit the construction of more

than 87,000 sq. ft. of housing (a maximum additional FAR of 5:1) on this site. This would be approximately 1,000 sq. ft. less than the amount of residential use proposed as part of the project. The remainder of the GDD housing requirement would have to be provided off-site or by reducing the commercial floor area of the building.

NOTES - Land Use

/1/ Resolution No. 6112, adopted by the San Francisco City Planning Commission June 29, 1967.

/2/ 1978-1979 General Manager's Report on the Open Space Requisition and Park Renovation Fund, January 4, 1978, Recreation and Park Commission.

/3/ Ordinance No. 469-81, passed by the San Francisco Board of Supervisors September 14, 1981.

B. URBAN DESIGN

VISUAL EFFECTS

The project would result in the destruction of two small-scale, brick structures and the construction of a 24-story building, approximately 300 ft. in height. The proposed building would be infill development between the Holiday Inn and Transamerica Pyramid, contributing to the apparent bulk formed by existing structures along the northern Financial District C-3-0 boundary. The project design is intended by the architect to complement visually adjacent buildings and to provide a transition between nearby highrises and the smaller structures of the Jackson Square Historic District. The project is intended by the architect to increase the visual definition of the site and to present a unifying element in the architecture of the site vicinity.

Views of the project from adjacent streets would include all or part of the project tower. From nearby locations on Washington St., Columbus Ave., and Merchant St., views of the project would include the full height of the tower. The height of the proposed structure would increase the so-called "urban-canyon effect" of adjacent Financial District Buildings, particularly on Merchant St. (see Figure 17, p.55). Pedestrian views of the site from the

Montgomery St. corridor, north of the site, would include the full height of the tower. South of the site on Montgomery St. portions of the project tower would be blocked by the adjacent 601 Montgomery St. building. The project would represent the northern end of the high-rise building "wall" on the west side of Montgomery St.

- The project would interrupt some views of the Bay from the upper stories of the 601 Montgomery St. building. Similar views from the proposed structure would be created. The project would interrupt some views to the west from portions of the Transamerica Pyramid; however, affected views are already partially blocked by the Holiday Inn. The Holiday Inn is a north/south-facing structure and occupants would not have a view of the project building. (See photos taken from the Holiday Inn, on file at the Office of Environmental Review.) The project would not block any long-range views from structures north of the site as these are blocked by existing development. From Portsmouth Square, west of the site, the project would partially block short-range views of some buildings, but it would not obstruct any views of the Bay, as buildings east of the site presently block views of the Bay from the Portsmouth Square Area.

The project would be visible in the downtown skyline from some long-range viewpoints. The proposed structure would be visible from Telegraph Hill, obstructing existing views of the 601 Montgomery St. building and buildings to the south such as the Aetna and Pacific Telephone buildings (see Figure 18, p.56). From Chinatown, the project would be visible between the Holiday Inn and the 601 Montgomery St. buildings, obstructing views of the lower portions of the Transamerica Pyramid (see Figure 19, p. 57). The upper level project setbacks on the corner of Washington and Montgomery Sts. are intended by the architect to preserve views from upper Columbus Ave (see Figure 20, p. 58). When viewed from long-range viewpoints to the northeast, north and west, including Russian Hill, the project would not serve as a major visual focus in the downtown panorama, due to the prominence of taller structures such as the Transamerica Pyramid and Bank of America Building. The project would not be visible from the southern approaches to the City on the James Lick and Bayshore freeways or from Potrero Hill, due to intervening structures.

The residential portion of the project would generally be oriented with views towards the north and east, with the exception of 16 units which would have a south or west orientation. To the north, views would be unobstructed towards Telegraph Hill, Coit Tower, and the Bay. To the south and east, views would be directed to nearby buildings in the Financial District. The tapering form of the Transamerica Pyramid, and its approximately 100-ft. distance from the site, would reduce the apparent mass of this structure as seen by east-facing occupants of the project. Nighttime views of the lighted Transamerica Pyramid would also be seen from the east-facing units. The residential portion of the project would be above the adjacent 19-story 601 Montgomery St. building, allowing short-range unobstructed views to the south. In some cases, direct views to the west would be blocked by the Holiday Inn; the base of the Holiday Inn is located approximately 10 ft. from the base of the project. Views to the north or south would be available from all residential units with views blocked to the west by the Holiday Inn.

#### DESIGN

The project is intended by the architect to relate architecturally to existing buildings in the site vicinity. The project design includes a series of upper level setbacks, "stepping down" in the northeast and southeast-facing facades of the building (see Figure 21, p.59). The upper portion of the tower would be shaped so that the vertical elements of the project would be in different planes than those of the adjacent Holiday Inn, providing a visual separation of the two buildings. The stepped tower design is intended to provide a height and bulk transition from the 52-story Bank of America Building at California and Kearny Sts., and the 48-story Transamerica Pyramid, directly east of the site, to the smaller-scale two- to eight-story structures that characterize the Jackson Square Historic District to the north and northeast.

- To define the building base and provide pedestrian interest, the building exterior at the the first two stories would be different from the upper levels. The upper levels of the facade would be composed primarily of metal panels and tinted glass. The building setbacks would be distinguished from the rest of the facade by a combination of opaque materials and tinted glass.



**SOURCE:** Environmental Science  
Associates, Inc.

**FIGURE 17: View of Merchant Street**



← Project →

**SOURCE:** Environmental Science  
Associates, Inc.

**FIGURE 18:** View from Telegraph Hill  
(Montgomery and Green Streets)



**Proposed Structures:**

◀ **Project**

◀ *Bank of Canton  
Building*

◀ *456 Montgomery  
Street*

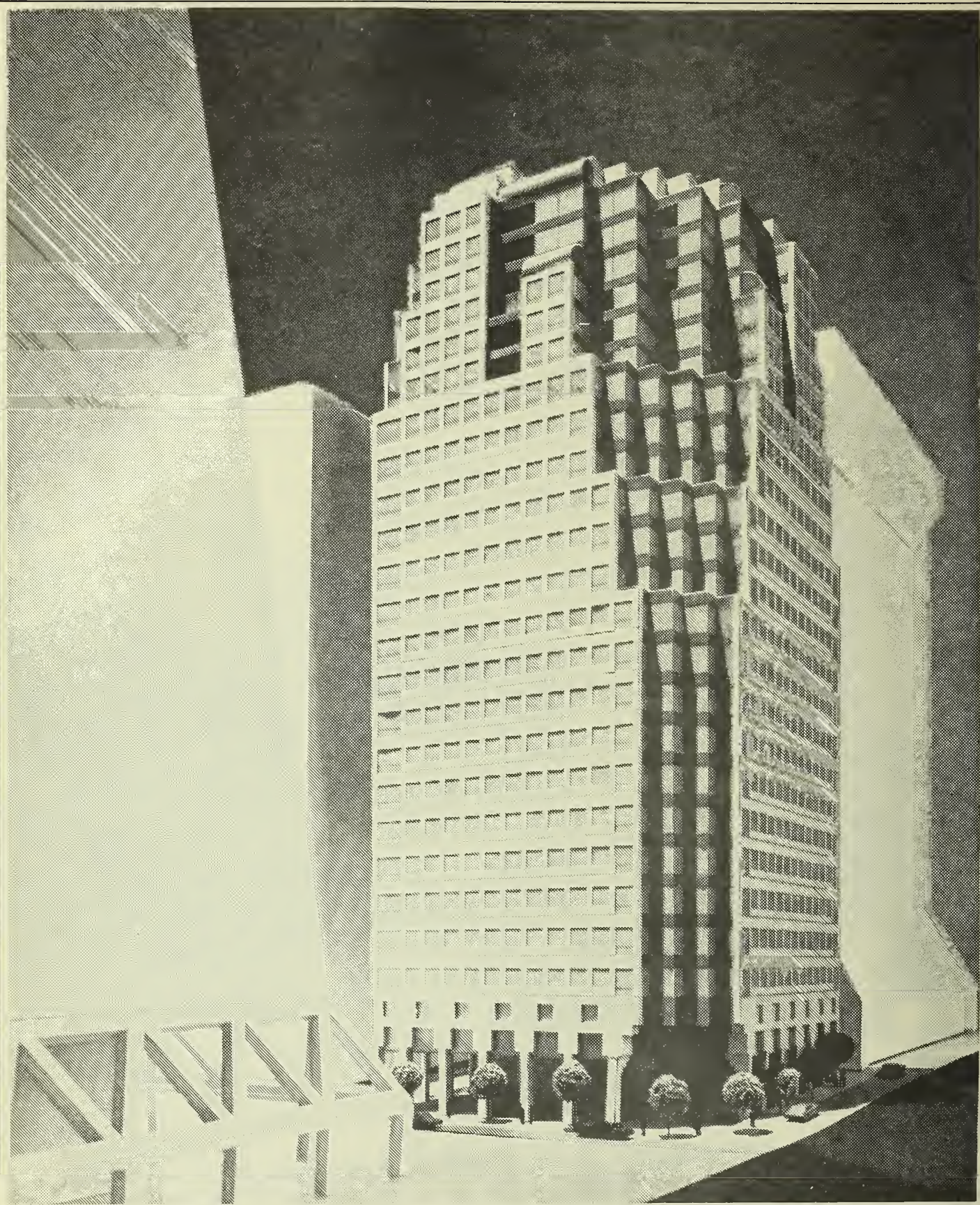
**SOURCE:** Environmental Science Associates, Inc.

**FIGURE 19: View from Chinatown  
(Powell and Clay Streets)**



**SOURCE:** Environmental Science  
Associates, Inc.

**FIGURE 20:** View from Columbus Avenue



SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 21: View of the Project Model  
(from the northeast)

The Urban Design Element of the San Francisco Comprehensive Plan provides a basis in City policy for summarizing the urban design implications of the proposed project (see Table 3).

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE SAN FRANCISCO COMPREHENSIVE PLAN\* AND THE PROPOSED PROJECT

URBAN DESIGN POLICIES	RELATIONSHIP OF PROJECT TO POLICIES
<u>A. Policies for City Pattern</u>	
1. Policy 1. "Recognize and protect major views in the city, with particular attention to those of open space and water." (p.10)	The project site is outside the City's major designated view corridors along Pine St. and California St. The project would be in the "Portsmouth view corridor", but would not obstruct any long-range views because buildings east of the site presently block distant views of the Bay from the Portsmouth Square Area and the Portsmouth corridor has generally been filled by development. No short-range views would be blocked by the project, and new views of the Bay would be created.
2. Policy 3. "Recognize that buildings, when seen together, produce a total effect that characterizes the city and its districts." (p.10)	The project would be visible, but not prominent, in views of the skyline. Together with the adjacent highrise buildings, the project would define the northern edge of the Financial District and provide some transition between taller buildings nearby and the smaller buildings of the Jackson Square Historic District. The project together with the Holiday Inn could result in a wall effect emphasized by identical building heights, although project setbacks are intended to avoid this effect.

\*City and County of San Francisco, 1971, Comprehensive Plan, Urban Design Element. (page references shown in parentheses).

SOURCE: Environmental Science Associates.

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE  
SAN FRANCISCO COMPREHENSIVE PLAN\* AND THE PROPOSED PROJECT  
(Continued)

3. Policy 5. "Emphasize the special nature of each district through distinctive landscaping and other features." (p.12)	The project would include street trees on Montgomery and Washington Sts. The entry plazas, residential lobby, and pool area would be landscaped. There is presently no distinct landscaping in the immediate vicinity of the site.
4. Policy 8. "Increase the visibility of major destination areas and other points for orientation." (p.13)	The project would be cut back at the Montgomery and Washington St. corner to preserve views of the Transamerica Pyramid from upper Columbus Ave. and to respond to the Pyramid's sloped configuration.
<u>B. Policies for Conservation</u>	
5. Policy 6. "Respect the character of older development nearby in the design of new buildings." (p.25)	The project would represent a departure in style and scale from the neighboring Jackson Square area and a departure in style from older Financial District buildings. The upper-level setbacks would provide some transition between the taller Financial District buildings and the low-rise Jackson Square District.
<u>C. Policies for Major New Development</u>	
6. Policy 1. "Promote harmony in the visual relationships and and transitions between new and older buildings." (p.36)	See Items 2, 3, and 5 above. According to the Urban Design Plan, buildings should be sympathetic to the scale, form and proportion of adjacent development. The setback design on the upper northeast- and southeast-facing facades of the project would provide a height and bulk transition from nearby highrise buildings and the smaller structures which characterize the Jackson Square Historic District.

TABLE 3: RELATIONSHIP BETWEEN APPLICABLE URBAN DESIGN POLICIES OF THE  
SAN FRANCISCO COMPREHENSIVE PLAN\* AND THE PROPOSED PROJECT  
(Continued)

7. Policy 2. "Avoid extreme contrasts in color, shape and other characteristics which will cause new buildings to stand out in excess of their public importance." (p. 36)	The faceted upper-floor setbacks are designed to reduce the apparent bulk and scale of the project. The building would contain no reflective glass or high intensity lighting and, hence, would not impose reflective or glaring light on other properties or nearby roadways.
8. Policy 5. "Relate the height of buildings to important attributes of the city pattern and to the height and character of existing development." (p.36)	See Items 2, 3, 5 and 7 above. The project would be comparable in height to the adjacent Holiday Inn and 601 Montgomery St. buildings, shorter than the Transamerica Pyramid, to the east, and taller than nearby low-rise buildings to the north.
9. Policy 6. "Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or dominating appearance in new construction." (p.36)	See Items 2, 3, 5, and 7 above. The maximum horizontal dimensions of the project would be comparable to nearby structures in the Financial District. The project would be greater in bulk than older low-rise buildings outside the C-3-0 district in the Jackson Square Historic District to the north. The faceted upper-floor setbacks are intended to reduce the bulk and scale of the project.
10. Policy 13. "Improve pedestrian areas by providing human scale and interest." (p.57)	The project would include widened sidewalks on Washington and Montgomery Sts. The project would have ground-level retail uses and a sculptured street-level facade surfaced with green-black polished granite, and include a pedestrian arcade to facilitate shortened walking distances and provide street-level interest. The ground-floor and parking-level exterior would be different from the upper stories to define the building base and promote pedestrian interest.

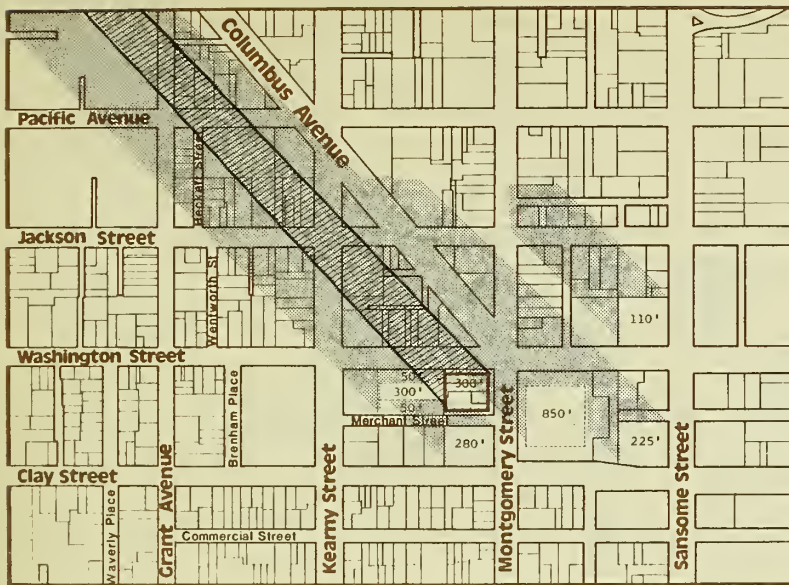
##### SHADOW

The project, in replacing existing low-rise structures on the site, would create more extensive shadow patterns than exist at present. Much of the project shadow patterns would coincide with those cast by existing structures in the area (601 Montgomery, Holiday Inn, and the Transamerica building). The project would not shade any existing public parks.

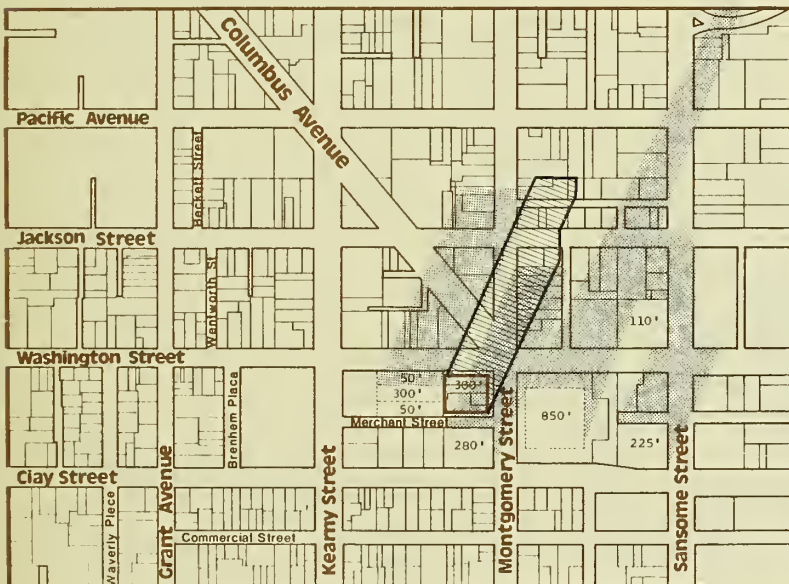
Washington and Montgomery Sts. are shaded by existing structures throughout the day at all seasons of the year. Portions of Columbus Ave. are shaded from mid-morning to early afternoon hours in the fall, winter and spring months. Portions of the lower floors of the Transamerica Pyramid are shaded in the late afternoon year-round. Sansome St., one block east of the site, is shaded in the late afternoon year-round, and in the early afternoon in the fall through spring months.

At all seasons of the year, early-morning shadows due to the project would generally coincide with shadows from existing structures. New shadows from the project would begin to occur during mid-morning and would continue through most of the day; primary shadow effects would be on the portions of Washington and Montgomery Sts. adjacent to the site. Portions of the widened sidewalk and seating area on the north side of the Transamerica Pyramid would be shaded by the project in the late afternoon at all seasons of the year.

During the mid-morning hours in the winter months the project would complete the shading of Columbus Ave. from Washington St. to Pacific Ave., eliminating the existing corridor of sunlight between shadows cast by the 601 Montgomery St. building and Transamerica Pyramid. Towards midday the project would eliminate the existing corridor of sunlight between the shadows of the Holiday Inn and 601 Montgomery St. building, shading Washington St. adjacent to the site, and Montgomery St., north to Jackson St. (see Figure 22). Shadows from the project would eliminate this existing corridor of sunlight throughout the day, completing the shading of portions of Montgomery and Sansome Sts. in the late afternoon hours. The project would contribute to shading portions of the widened sidewalk area on the north side of the Transamerica Pyramid in the late afternoon (see Figure 22).





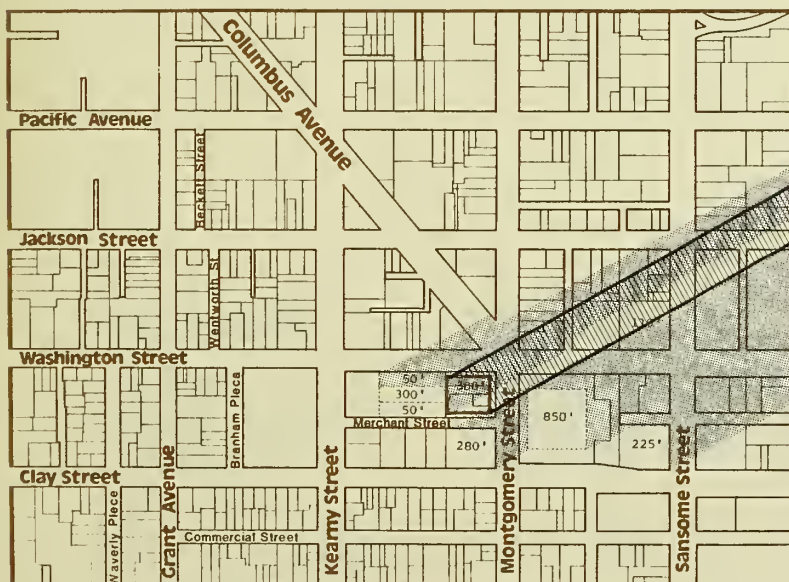
8 A.M.



1 P.M.

#### LEGEND

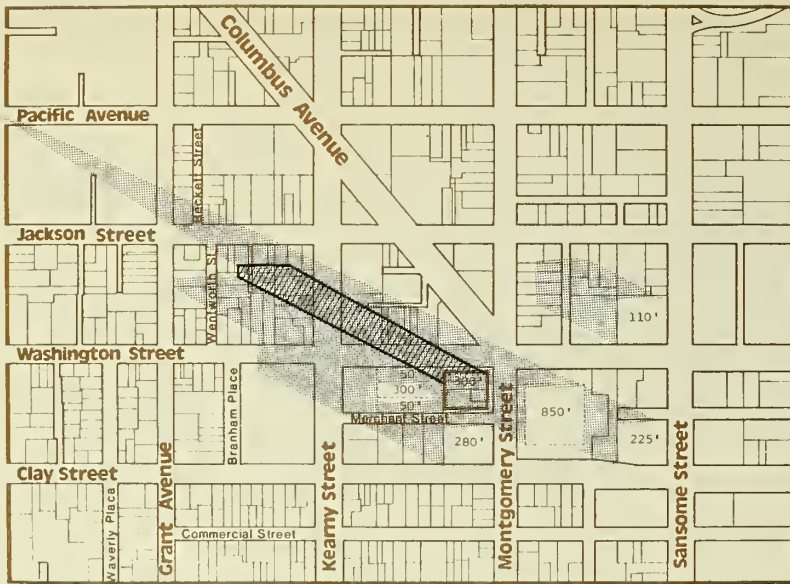
-  Proposed Building Shadow
-  Existing Shadow



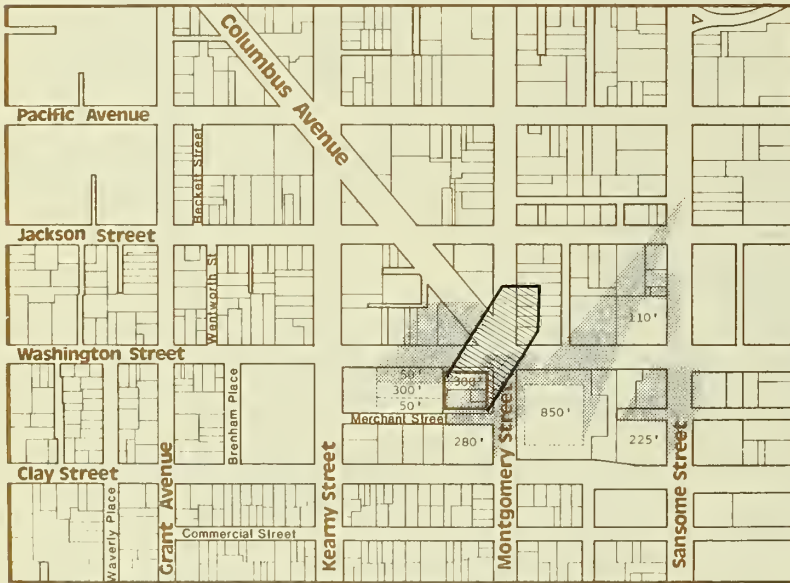
4 P.M.

● FIGURE 22  
Projected  
Shadow Patterns  
in Vicinity  
of Project  
Mid-December



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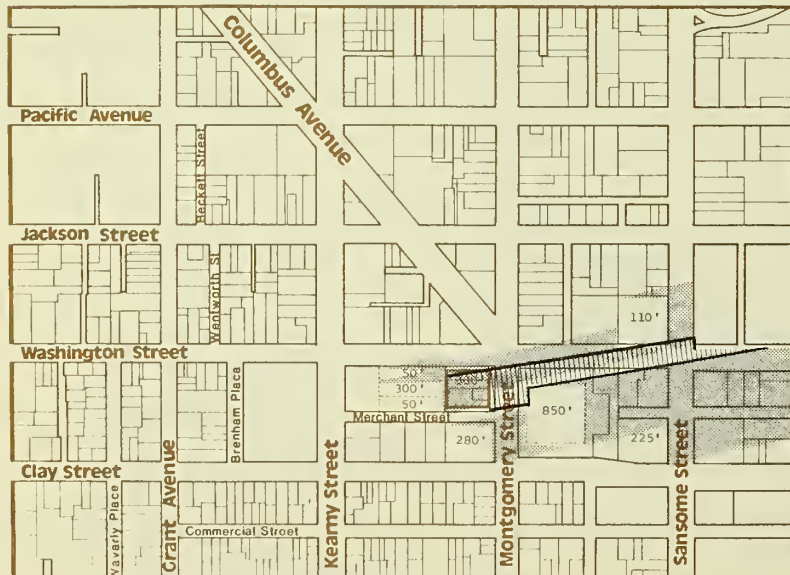
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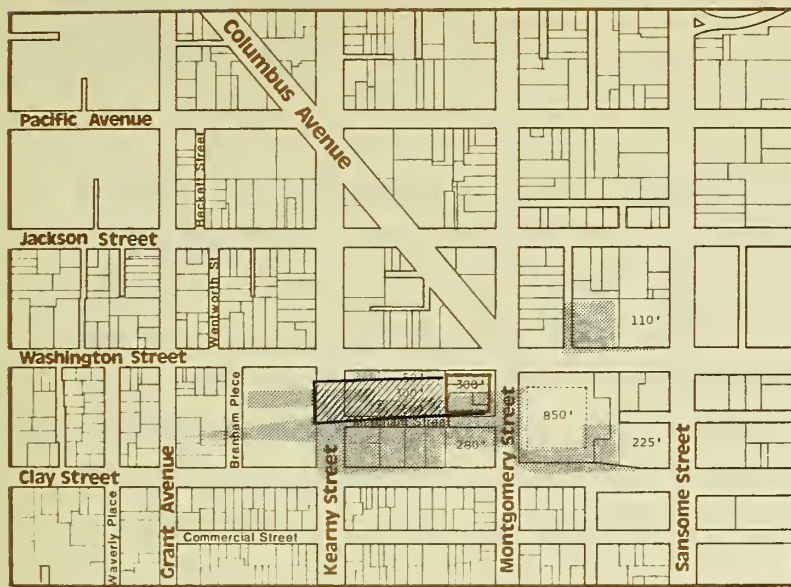
LEGEND

-  Proposed Building Shadow
-  Existing Shadows

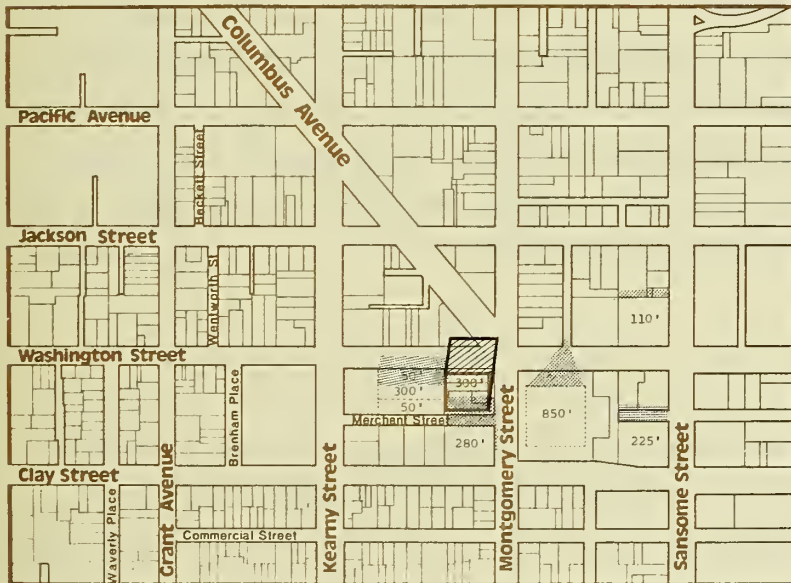
4 P.M.



**FIGURE 23**  
Projected  
Shadow Patterns  
in Vicinity of  
Project  
Mid-March and  
Mid-September



8 A.M.



1 P.M.

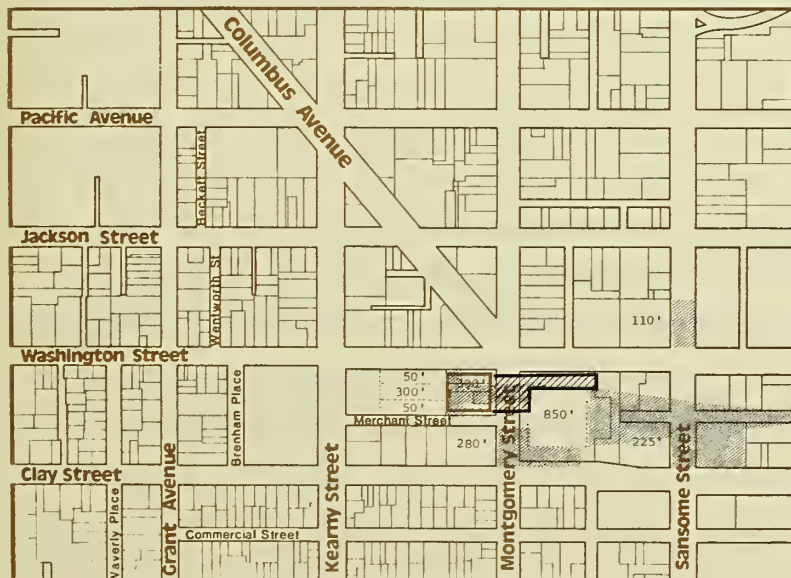
#### LEGEND



Proposed Building  
Shadow



Existing Shadow



4 P.M.

**FIGURE 24**  
Projected  
Shadow Patterns  
in Vicinity of  
Project  
Mid-June

During the mid-morning and mid-afternoon in spring and autumn, the project would add to the shadowing of Washington St. and Columbus Ave., north of the site. In the late afternoon hours the project would eliminate the existing corridor of sunlight between the shadows of the 601 Montgomery St. building and the Holiday Inn, shading Washington St. east to Sansome St., and contributing to shadows on the lower floors of the Transamerica Building. The project would contribute to shading portions of the widened sidewalk and seating area on the north side of the Transamerica Pyramid in the late afternoon (see Figure 23, p.65).

Morning and early afternoon shadows cast by the project during the summer months would shade Washington St. In the late afternoon, project shadows would be confined to Montgomery St. directly east of the site and portions of the Transamerica Building. The project would shade the widened sidewalk and seating area on the north side of the Transamerica Pyramid in the late afternoon during the summer (see Figure 24, p.66).

#### WIND /1/

Northwesterly and westerly winds are the most frequent and strongest winds during all seasons in San Francisco. In the summer, winds blow from the northwest 12% to 39% of the time, exceeding 13 miles per hour (mph) 35% of the time and 25 mph 3% of the time. Winds blow from the west 15% to 40% of the time, during the summer, exceeding 13 mph 29% of the time and 25 mph 7% of the time.

Wind speeds at pedestrian level can be predicted by comparing the ratio of pedestrian-level wind speed to the freestream wind speeds above the wakes of surrounding buildings. This ratio is called the wind speed ratio and is expressed as percentages of the freestream wind speed, which is essentially that as measured at the top of the Federal Building at 50 Fulton St., about 1.2 miles southwest of the site. For San Francisco, the commonly-used definitions of pedestrian-level wind speed ranges are as follows: /2/

<u>Velocity Ratio</u>	<u>Ratio of Pedestrian Level Windspeed to Calibration Windspeed</u>
Low	- 0.19
Moderately Low	0.20 - 0.29
Moderate	0.30 - 0.49
Moderately High	0.50 - 0.69
High	0.70 - 1.00
Very High	Greater than 1.00

On July 22, 1981, windspeeds and turbulent intensities at various points on and near the project site were measured. Subsequently, wind tunnel tests of localized wind speeds and directions at and near the project site were conducted using a scale model of the site and vicinity. The study included separate tests of northwest and west winds under existing conditions; with the proposed project; and with an alternative building design.

For northwest winds, existing wind speed ratios are generally low to moderate, varying from 0.19 to 0.48. Most locations near the site have speed ratios of less than 0.30. The intersection of Columbus Ave. with Washington and Montgomery Sts. is gusty (gustiness indicates variable wind speeds, changing over short periods of time). There are moderately low to moderate winds along Washington and Kearny Sts. (wind speed ratios of 0.20 to 0.35). Winds are in the moderate range along Columbus Ave. upwind of the site (ratio of 0.25) and Merchant St. adjacent to the site (0.30 to 0.35). Vertical vortices form off both the north and south downstream edges of the Transamerica Pyramid under existing conditions.

For west winds, existing wind speed ratios in the vicinity are generally low to moderate, varying from 0.13 to 0.46. The intersection of Columbus Ave. and Washington St. is gusty, but less so than with northwest winds. Wind speeds on Washington St. are moderate (wind speed ratios of 0.35 to 0.46), being highest north of the Transamerica Pyramid. Vertical vortices, stronger than those under northwest winds, occur off both the north and south downstream edges of the Transamerica Pyramid, creating turbulence at the Transamerica Redwood park, east of the Pyramid. The local wind direction is variable along

Montgomery St. between the project site and the Transamerica Pyramid, but wind speeds are generally low over most of the block. Wind speeds at other locations near the site are low to moderately low.

The project would change the existing wind environment of the site vicinity. Under prevailing northwest wind conditions, the project would have several effects. The intersection of Clay and Montgomery Sts. to the south would be less windy (a wind speed ratio of 0.50 would be reduced to 0.40) and less gusty than existing conditions. The vortex mid-block on Kearny St. between Washington and Jackson Sts. would be eliminated due to "shelter" from the project. A moderately high wind speed ratio (a ratio of more than 0.55, or about 2.5 times the existing wind speed ratio) would prevail on Montgomery St. east of the project site./3/ There would be steady, moderate winds around the northeast corner of the proposed building, under the covered walkways and at the project entrances. Street-side glass walls, vegetation, or other screening at the covered walkway area would provide pedestrian protection from these winds. Wind speed ratios would more than double (from a moderately low ratio of 0.20 to a moderate ratio of nearly 0.5) at the southeast corner of the Columbus Ave. intersection with Montgomery and Washington Sts. Wind speed ratios at the southwest corner of the Holiday Inn and along Merchant St. would increase slightly, but would still remain moderate. Wind speed ratios on Washington St. north of the site would increase about 30%, but would remain moderately low.

Under westerly winds, the project would result in a recirculating wind flow pattern on Washington St. north of the project site, with about 15% higher wind speed ratios than now exist. On Washington St., midway between Kearny and Montgomery Sts., a vortex with rapid changes in wind direction over short distances would occur. The project would increase turbulence on Washington St. north of the Transamerica Pyramid, but the average wind speed would decrease by about 30% from the existing conditions, thus minimizing the turbulent effect on Washington St. The project would increase street-level turbulence and gustiness directly east of the proposed building. The turbulence and gustiness east of the project would be variable, conceivably changing over short distances under the covered pedestrian walkways and at the

building entrances. The remainder of the wind flow pattern due to west winds would be essentially the same as at present.

Discomfort to pedestrians begins to appear at wind speeds of about 12 miles per hour (mph).<sup>/4/</sup> Pedestrian discomfort would not occur frequently in the project vicinity because, based on observed wind speed ratios, freestream wind speeds of about 25 to 63 mph for northwest winds and 26 to 93 mph for westerly winds would be required for street-level winds to reach 12 mph. Wind speeds greater than 25 mph occur 3% and 7% of the time for northwesterly and westerly winds, respectively.

The Holiday Inn would produce a strong downstream recirculation zone, creating high levels of turbulence at the proposed swimming pool, under both northwest and west winds. A windscreen has been tested and would adequately mitigate the effects of the recirculation zone.

#### NOTES - Urban Design

/1/ This section is based upon a study entitled, "Wind-Tunnel Studies of the Montgomery-Washington Building", July 1981, prepared by Dr. Bruce White, University of California at Davis, as a subconsultant to Environmental Science Associates, Inc. A copy of this document is included in Section X of this report as Appendix B., p. 248.

/2/ Note that windspeed ratios are not actual wind speeds but ratios. Thus a point having "very high" wind speed could still experience light winds on a near-calm day. Likewise, a point found to have "low" wind speed could experience significant winds on an extremely windy day.

/3/ This effects is due, in part, to a shift in the existing wind flow pattern. At present, northwest winds concentrate along Columbus Ave. and split nearly evenly along Montgomery and Washington Sts. due to the Transamerica Pyramid. The proposed building design would results in less wind resistance along Montgomery St. than along Washington St. As a consequence, more of the wind from Columbus Ave. (a wide street) would funnel into Montgomery St. (a narrower street) and accelerate as it encounters the more confined street.

/4/ "Caution's in the Wind for San Francisco High-rise Architects", Los Angeles Times, p.3 May 18, 1981

C. EMPLOYMENT, HOUSING AND FISCAL FACTORS

## PROJECT-RELATED EMPLOYMENT

About 960 permanent full time jobs would be provided within the project. In the absence of specific information about tenants, this number was derived by applying an average sq. ft. per employee number by use to the estimated floor area that would be devoted to each use (see Table 4). The net increase in employment at the site, after subtracting the number of jobs at the site in mid-1981, would be approximately 950.

TABLE 4: PROJECTED PERMANENT EMPLOYMENT AT THE PROJECT SITE

<u>Employment Type</u>	<u>Building Space (Gross Sq. Ft.)</u>	<u>Space Per Employee (Sq. Ft.)</u>	<u>Projected Number of Employees</u>
Office	236,600	250	946
Retail/Restaurant	4,000	500	8
Building Maintenance	331,700	30,000	11
TOTAL EMPLOYMENT			<u>965</u>

SOURCE: Environmental Science Associates, Inc. and Crow-Spieker Companies

## BAY AREA EMPLOYMENT MULTIPLIER EFFECTS

Secondary employment and income impacts would result from permanent project employment because each employed person would generate additional employment by his or her demands for goods and services, through the multiplier effect. Assuming that the new jobs created by the project were primarily in finance, insurance, and real estate (the so-called FIRE sector), about 1,140 additional jobs in other sectors of the Bay Area economy would result from the growth of FIRE businesses./1/

The total number of Bay Area jobs that would be supported by growth in downtown employment due to the project would be about 2,090 (the 950 net project jobs plus the 1,140 jobs induced by the multiplier).

The project would require about 300 person-years of construction labor, an average of about 150 full-time jobs throughout the nearly two-year construction period. About 480 additional person-years of employment would be generated in the Bay Area as a result of the multiplier effect of project construction.

#### OFFICE

● The proposed project, together with other major downtown office buildings under construction and approved (as of November 1981) would add approximately 8.7 million gross sq. ft. of office space if all were to be built (see Appendix C, Table C-1, p. 266). At 1970-79 absorption rates, this is equivalent to about an eight-year supply. Low vacancy rates together with rising rents suggest that supply has been less than demand.

If office employment in San Francisco continues to account for the same percentage of overall employment growth as it has in the past decade, projections by the Association of Bay Area Governments (ABAG) suggest that a net increase of about 1.25 million sq. ft. of office space will be required each year between 1980 and 1985 to accommodate that growth./2/ Demand for office space, however, could be even greater. The ABAG projection indicates that 1.25 million additional sq. ft. of office space will be occupied each year. This could be because no more than that would be demanded or because no more would be supplied. If occupancy is limited by supply, then more than 1.25 million sq. ft. of new space would be occupied each year if more than that amount were built. Vacancy rates and the rate of rent increase suggest a backlog of demand. One commercial real estate broker foresees that by 1984, 9.1 million sq. ft. of office space will be available, and all but about 2 million of this amount is presently leased./3/

The growth of office space would continue the trend of regional growth in service-sector and office headquarters activity and employment. The larger, newer buildings would be occupied primarily by larger tenants and those with

the ability to pay higher rents. Because rent levels are lower for older buildings, the space which becomes vacated by tenants relocating to newer buildings could become available for tenants who cannot afford the higher rents for new office space. /4/

New increases in downtown office space and employment would increase the demand for retail goods, food and business services in the area. To the extent that the new space would not be occupied by firms providing these services, demand would increase for existing space and possibly for further development.

Multiplier effects would support additional employment in San Francisco and throughout the Bay Area in a number of different industrial and occupational groups. In addition, the construction industry would continue to be active while contributing to the area's economy through its own multiplier effects.

#### HOUSING

As indicated in the previous subsection, (p.71), the project would result in an increase in downtown office employment of approximately 950 jobs by 1985. To the extent that the project would attract out-of-area employees and contribute to the formation of additional households by existing area residents, it would also contribute to increase local housing demand and a jobs/housing imbalance.

Probable housing impacts of additional downtown employment are discussed in the Five Fremont Center, Final EIR, (EE 80.268, Certification Date March 12, 1981), pp. 85-91. This document is available for public review at the Department of City Planning, Office of Environmental Review, 45 Hyde St., Room 319, and is hereby incorporated by reference into this EIR. Due to both the relatively high wages and housing prices in San Francisco, many people are attracted to the employment opportunities, but are unable to afford housing. By 1985, it is projected that cumulative San Francisco housing demand resulting from Downtown office development will be about 17,000 units. This demand would exceed the projected growth in City housing stock by an estimated

9,000 to 12,000 housing units. This total demand is expected to cause some downtown employees to seek housing in other Bay Area locations.

Residency patterns for new employees that would be generated by the project are based on housing assumptions developed by the San Francisco Department of City Planning in a memorandum entitled "Housing Requirement for Office Development in San Francisco," July 1981, and by approximate residency patterns of downtown office employees surveyed for five other recent Downtown EIRs (see Appendix C, Table C-2, p. 268). It is assumed that about 40% are expected to reside in San Francisco, 18% on the Peninsula, 30% in the East Bay, and 12% in the North Bay. According to the Department of City Planning housing formula, which is under development, the proposed project would generate demand for about 210 units of housing in San Francisco. (It is assumed for the formula that office use generates one employee for each 250 sq. ft., that 40% of all employees will desire to live in San Francisco, that 1.8 working adults occupy each unit, and that each employee will require an average of 400 sq. ft. of residential space.) The 40 condominiums (containing 90 bedrooms) proposed would provide for approximately one/fifth of the housing demand generated by the project. The number of new households estimated to be generated outside of San Francisco as a direct result of the project are about 110 on the Peninsula, 180 in the East Bay, and 65 in the North Bay (see Appendix C., Table C-2, p. 268).

● The amount of housing demand in San Francisco created by the proposed project would be about 2.5% to 4.0% of the City's projected housing growth from 1980 to 1985 (see Appendix C, Economic and Fiscal Factors, Table C-2, p. 268). It is not possible to quantify the effects on San Francisco housing prices resulting from housing demand created by the proposed project, as housing demand and cost are also affected by regional growth in housing stock, employment, population and national economic trends. Secondary employment attributable to the project would tend to increase housing demand levels above those directly attributable to the project. However, due to uncertainties in projecting distributions of secondary job sites and residential patterns, the distribution and magnitude of secondary housing demands in the City and the remainder of the region can not be reliably quantified.

#### IV. Environmental Impacts

The proposed location of condominium apartments at the northern border of the Financial District could generate local demand for resident-serving retail and personal services. To the extent that the project would not be occupied by firms providing these services, demand would increase on existing retail facilities in the area and possibly increase demand for further new retail development.

- The San Francisco Subdivision Code requires provision of 10% low and moderate income housing in projects of more than 50 dwelling units, provided subsidies are available. The project would provide about 40 condominiums and would not include any low and moderate housing. Units would contain from one to four bedrooms (1,040 sq. ft. to 2,025 sq. ft.); sales prices would vary by size and would range from about \$312,000 to \$607,500 (1981 dollars). Information from the San Francisco Board of Realtors shows that the average selling price of a home in the City in 1981 is \$151,203./5/ The sales price of homes sold in the week of October 1, 1981 ranged from \$95,000 to \$236,750.
- Published information on office workers in the Bay area indicates the annual salary for support personnel ranges from \$7,800 to \$26,000 and that for clerical personnel ranges from \$7,800 to \$30,000./6/ Salary information on professional occupations is not available and there is no published information on income levels for employees specifically in San Francisco. To estimate probable income levels of project office workers, the 601 Montgomery St. building was surveyed to determine tenant distribution and corresponding salary ranges. This building is located adjacent to the project site, is similar to the project's square-footage, and is managed by the project sponsor. Approximately 60% of 601 Montgomery St. tenants were surveyed. The results indicate that about 34% of the office workers are professionals with salaries from \$21,000 to \$300,000 (average \$90,000); 36% are middle management with salaries from \$12,000 to \$70,000 (average \$45,000); and 30% are secretarial/support workers with salaries from \$10,000 to \$35,000 (average \$19,200)./7/
- Financial institutions are currently allowing 35% of a buyer's gross monthly income for mortgage payments. It is not known to what extent the tenant and employee composition of the proposed project would resemble that of 601 Montgomery St., but were the project to contain a similar distribution of office workers and salary ranges, then 34% of the project office workers could afford monthly mortgage payments of \$615 to \$8,750 (average \$2,625), 36% could afford from \$350 to \$2,040 (average \$1,315), and 30% could afford from \$290 to \$1,020 (average \$560). Most San Francisco households have 1.8 working adults per unit, but the exact number of workers per household by job classification

has not been determined (higher housing prices are probably causing more workers to live together in one household in order to afford housing). Assuming 1.4 workers per household for professional and 2.0 workers per household for support and clerical, 34% of the project worker households could afford housing priced from \$71,000 to \$1,016,000 (average sale price \$305,000); 36% could afford housing from \$58,000 to \$338,000 (average sale price \$218,000); and 30% could afford housing from \$48,000 to \$169,000 (average sale price \$93,000)./8/

#### REVENUES TO CITY

The project would have a fair market value of about \$50 million (in 1981 dollars)./9/ Based on an estimated \$12.5 million assessed value, the property would generate about \$500,000 in revenue to the City's General Fund from the \$4 (per hundred dollars of assessed value) non-bond property tax.

The building would also generate property tax revenues which would be used to retire bond debts. The tax rate at which these revenues would be generated in 1985 would depend on the amount of principal and interest payments due in that year and the total assessed value of property in San Francisco. The rate in 1981 is \$0.92 per hundred dollars of assessed value. If that were still the rate in 1985, when the building would be occupied, revenues from the building would be \$115,000.

The payroll tax is paid on the earnings of about nine existing employees at the project site. At a rate of 1.1% of total earnings, payroll tax revenues presently total about \$1,280./10/ Payroll taxes would be paid to the City General Fund on the earnings of approximately 900 of the 950 net new employees in the project. The remainder would be exempt from the tax either because they would work for banks or insurance companies (which are not required to pay San Francisco payroll taxes), because they would work for small, retail tenants with tax liabilities less than \$500, or because they would be owners of businesses (who are also exempt). Based on an average wage of \$24,600 for office workers in 1981, the payroll tax revenues would be about \$243,000. /11/

Sales tax revenues are generated by both employee expenditures and restaurant sales. The average office worker in downtown San Francisco is estimated to make taxable expenditures of \$1,070 annually in the central business district./12/ Sales tax revenues allocated to the City and County of San Francisco are 1% of taxable sales. Sales tax revenues generated by existing uses on the project site are about \$430 per year./13/ Estimated sales tax revenues allocated to the City by the project would be about \$10,100.

Sales tax revenues generated on the site by the 1/2% BART sales tax are presently about \$215 a year. Of that amount, BART receives \$161 directly, and the remaining \$54 is distributed by the Metropolitan Transportation Commission. Estimated sales tax revenues from the 1/2% BART sales tax generated by project would be about \$5,050. Of this total, BART would receive \$3,790 directly, and the remaining \$1,260 would be distributed by the Metropolitan Transportation Commission. Sales tax revenue would also be generated by the retail uses of the site. This amount can not be determined until the types of business are identified.

The project sponsors pay a gross receipts tax on their rental income from the existing buildings on the site. Total annual rental income is about \$85,800./9/ At a tax rate of 0.22%, annual gross receipts tax revenues from the existing buildings are about \$190. The two existing restaurants also pay a gross receipts tax on their annual sales volumes.. Based on an annual income of \$28,000, the tax from the restaurants is about \$60 per year. Based on estimated total annual receipts from rents of about \$7 million in 1981 dollars, tax revenues from the project (assuming full occupancy) would be about \$15,400.

General Fund revenues for the City and County of San Francisco from the project would total about \$768,500, based on the tax rates and fees in effect in mid-1981. General Fund revenues from the existing uses on the site totalled about \$46,600 in 1981.

Estimates of receipts from the payroll tax and gross receipts tax would increase by about 36% if the Mayor's Revenue Package, approved by the voters in November 1980, is fully implemented. The payroll tax would increase from

1.1% to 1.5% of total earnings and the gross receipts tax would be increased to \$5.00 per \$1,000 of revenues. The Mayor's Revenue Package was approved by less than the required two-thirds majority of the voters. A two-thirds majority is required under Proposition 13 for a "special tax". The validity of this measure is now being challenged in the courts.

#### MUNI

The City's General Fund provides a subsidy to the Municipal Railway's operating budget which covers the difference between Muni's costs and the revenue Muni receives from fares and from federal and state governments. This subsidy represents the cost of Muni to the City. The Muni average general fund deficit per ride to the City in 1981-82 is estimated at \$0.39 per ride./14/ Assuming that about 29% of the employees who occupy the existing buildings on-site ride Muni to and from work, the existing General Fund subsidy to Muni required by commuting on-site employees is about \$690 per year./15,16/ Assuming the 1981-82 subsidy would remain the same in 1985 and that 29% of the project employees would ride Muni to work, the project would create the need for a general fund subsidy to Muni of about \$50,300 at 1981 costs.

The project would help pay for the Muni deficit through its revenue contributions to the General Fund. In the 1980-81 budget, 10% of discretionary General Fund revenues were allocated to Muni. If this percentage were to remain constant, the project would generate around \$77,000 in General Fund Revenues to Muni in 1985. San Francisco Board of Supervisors approved on April 27, 1981, a proposal to assess new downtown commercial development to support Muni. The plan calls for levying a one-time fee of up to \$5.00 per gross sq. ft. on new downtown office space and creating a downtown district in which all commercial office owners would be assessed a yearly fee./17/ The fee plan has been legally challenged; but if it were to go into effect as proposed, the project could generate about \$1,170,000 for the one-time Muni fee. The rate of the yearly fee which would be assessed has not been determined.

BART

- BART fares cover about 40% of BART costs. For each BART passenger trip an average of \$1.00 is paid by fares, and an additional \$1.50 in costs must be supported by some other revenue source. Over 86% of this additional cost is supported by the special BART 1/2% sales tax. It is estimated that about 15% of the employees who occupy the existing buildings ride BART to work./15/ The estimated annual costs to BART that are not covered by these riders' fares are \$1,370./18/ BART's revenues from the sales tax generated by existing employees and BART's share of property tax revenue from the site total about \$3,950. BART's net surplus as a result of the activities at the site is estimated to be about \$2,300. Assuming the 1981 deficit per rider would be the same in 1985 and that 15% of project employees would ride BART to work, the project would generate a deficit of about \$58,450./19/

## CUMULATIVE FISCAL ASPECTS

- Since 1979, five studies have been prepared which have analyzed fiscal effects of development in the City's of C-3-0 Downtown Office District. The studies were prepared by: Recht, Hausrath and Associates, Sedway/Cooke, Gruen Gruen + Associates (GG+A), Arthur Anderson and Co., and David Jones, and are compared and discussed in the 101 Montgomery Street Final EIR, EE 80.26, pp. 189-199. This document is available for public review at the Department of City Planning, Office of Environmental Review, 45 Hyde St., and is hereby incorporated by reference into this EIR. These studies differ in various ways: in the questions they ask, the data sources they use, the methodologies they employ, and the conclusions they draw. Table 5 compares the purpose, study methodology, and conclusions of the five studies. The Gruen Gruen + Associates and Arthur Anderson studies were paid for by the San Francisco Chamber of Commerce. The Sedway/Cooke study was paid for by the City and County of San Francisco. The David Jones Study was prepared under the auspices of San Franciscans for Reasonable Growth. The Recht Hausrath & Associates Study was paid for by Environmental Science Associates under contract to the project sponsor for the 101 Montgomery St. Building and reviewed by the Department of City Planning.

#### IV. Environmental Impacts

The project would probably have an initial fiscal benefit. Because revenues to the City would probably increase at a slower rate than costs, due to Proposition 13 limitations on property tax increases, there would be a time when cumulative costs of providing services to currently proposed and approved development would be higher than revenues provided (assuming no new revenue sources are found and the rate of new development declines).

TABLE 5: SUMMARY OF RECENT STUDIES ON FISCAL IMPACT OF DOWNTOWN DEVELOPMENT

STUDY, AUTHOR, DATE	PURPOSE OF STUDY	DATA SOURCES	STUDY METHODOLOGY	CONCLUSIONS
"Fiscal Concerns" in Downtown San Francisco Conservation and Development Planning Program, Phase I Study, Sedway/Cooke, et al., October 1979, pp. 56-59	To qualitatively assess the likely fiscal impact of new development in the C-3 area under Proposition 0.	SPUR STUDY (1975)	SPUR cost/revenue estimates for downtown in 1973 and for projected growth 1974-1990 were assumed. Proposition 13's effect on revenues and the possible need for increased transportation infrastructure were considered. Generalized conclusions about fiscal impact of new development were drawn.	1) After Proposition 13, "costs may exceed revenues in the downtown by as much as 25%." 2) "[N]ew downtown development will not solve the city's growing fiscal problem; without new revenue sources, development will make it worse in the long run."
Downtown Highrise District Cost Revenue Study, Arthur Andersen & Co., November 1980	To quantify for 1976-77 and 1978-79 how much revenue the C-3-0 area generated and how much it costs to provide city services to the area.	Data compiled from city records and through conversations with city officials.	Only revenues generated within the C-3-0 and costs of providing services to the C-3-0 counted. "The principle guiding the study methodology was to calculate the amount of revenue that San Francisco would lose and the costs that could be reduced if the Downtown Highrise District were a separate city."	The C-3-0 generated \$56.79 million in 1976-77, or 61% more than the cost of city services to the area. In 1978-79, revenues were \$53.29 million, or 48% greater than costs.
"Fiscal Considerations" Appendix C, 101 Montgomery Street FEIR, Recht Hausrath & Associates, January 1981.	To draw generalized conclusions about "how new development downtown in a post-Proposition 13 environment is likely to change the City's fiscal health from what it would be without new development."	SPUR Study, city records and conversations with city officials.	Under alternative assumptions about the cost/revenue balance in existing buildings and in new buildings, the fiscal impact over time of new development was compared to that of no new development.	"[A]n on-going process of new development would improve the City's fiscal situation. This beneficial impact would cease if new development were halted. This conclusion is tentative due to uncertainties about increased Muni costs."
Downtown Highrise District Cost/Revenue Study, David Jones, February 1981.	To quantify for 1978-79 the revenues generated by businesses in the C-3-0 and the service costs imposed on the city and BART by the C-3-0.	Arthur Andersen study.	The Jones study differs from the Andersen study primarily as follows: 1) Costs of BART (but not revenues to BART) are included; 2) Only revenues paid by businesses and building owners are considered; 3) Muni deficit is computed differently; 4) Most costs are estimated as a percentage of revenues rather than on the basis of actual service demand in the C-3-0.	The C-3-0 imposed costs of \$94.4 million on San Francisco and BART, or 125% more than the revenues the area's businesses and building owners generated to San Francisco.
Fiscal Impacts of New Downtown High-Rises on the City and County of San Francisco, Gruen Gruen + Associates, March 1981	To quantitatively estimate city revenues from the C-3-0 and costs of serving the C-3-0 in 1998, assuming the addition of 30 million square feet of building space in the C-3-0 between 1981 and 1998.	Arthur Andersen study; data compiled from city records and through conversations with city officials.	"Only direct effects are considered." Costs are only measured for services "provided within the physical limits of the C-3-0 district" and revenues are limited to "taxes on buildings within the district and the activities that take place within those buildings." Assumes the Arthur Andersen study is accurate and builds upon it.	In 1980, revenues from the 39 million square feet of building space in C-3-0 were 1.66 times as large as costs. In 1998, after completion of the 30 million square feet of new space, revenues from the entire 69 million square feet of C-3-0 building space would increase to 1.92 times as large as costs.

SOURCE: Recht, Hausrath and Associates

Proposition 13 limits the amount of increased assessed valuation on property, in the years in which the property is not sold, to 2% annually. When a property is resold, it can be reassessed based on its market value. As private homes change ownership more often than commercial or office property, the property tax revenues from the residential portion of the project would increase at a faster rate than the property taxes from the other project uses.

An amendment to the City Planning Code to allow the amount of on-site housing proposed by the project would have an impact on subsequent development in the C-3 District. Such a modification of the Code would encourage the provision of additional on-site housing in future high-rise developments. Modification of the Planning Code to allow approval of the project would generally encourage more housing units in the C-3 District. An increase in housing would result in greater development of residential retail facilities and domestic conveniences, as well as greater 24-hour activity, in the Downtown.

#### NOTES - Employment, Housing and Fiscal Factors

/1/ Projections are based on the Bay Area Input-Output Model from Cooperative Extension Service, University of California, Berkeley, San Francisco Bay Area Input-Output Model 1967-1974, July 1978. A multiplier of 1.2 was used for FIRE and 1.6 for construction.

/2/ Association of Bay Area Governments (ABAG) and California Employment Development Department (EDD) data indicate that about 60% of the growth in San Francisco employment between 1972 and 1978 was in offices. ABAG projects that employment in San Francisco will increase 41,400 between 1980 and 1985, or an average of 8,300 per year. Sixty percent of that, or 5,000 jobs, are expected to be in offices. Assuming 250 gross sq. ft. of office space per employee, office employment growth would require an additional 1.25 million sq. ft. of office space each year. (Association of Bay Area Governments and Bay Area Council, San Francisco Bay Area Economic Profile, December 1979, pp. 40-43; California Employment Development Department, Wage and Salary Employment, By Industry, San Francisco City and County, 1972-1978.)

/3/ San Francisco Examiner, "Effects of S.F. Office Space Squeeze," January 18, 1981, report on a real estate conference sponsored by Coldwell Banker.

/4/ ABAG, April 1981, Bay Area Office Growth, Working Papers on the Region's Economy, Number One.

/5/ San Francisco Board of Realtors, October 5, 1981, "Multiple Sales Service" This information includes all homes sold from February 11, 1981 to October 1, 1981.

/6/ U.S. Department of Labor Statistics, March 1981, "Area Wage Survey for the San Francisco - Oakland, CA, Metropolitan Area."

● /7/ Lynn S. Flach, Trammell Crow Company, written communication, November 6 1981.

/8/ These calculations assume that buyers are using conventional financing with 20% downpayment at an 18% interest rate. This is a worst-case assumption, as some buyers might borrow money to put down large downpayments or find loans with lower interest rates (such as owner-financing).

/9/ Patrick Gilligan, Crow-Spieker Companies, letter communication, August 6, 1981.

/10/ Average annual earnings of the employees at the existing site were estimated to be about \$13,000 (based on information from the State of California Employment Development Department, San Francisco-Oakland Standard Metropolitan Statistical Area Annual Planning Information 1980-1981). The payroll tax is paid on the earnings of about 9 employees at the site. At a rate of 1.1% of total earnings, payroll tax revenues total about \$1,280.

/11/ Downtown office workers earn about \$24,600 annually in 1981, based on average annual earnings of \$16,300 for downtown office workers in 1974, in San Francisco Planning and Urban Renewal Association (SPUR), June 1975, Impact of Intensive High Rise Development in San Francisco, Detailed Findings. Data are inflated by about 51%, the national average percentage increase in weekly earnings of finance, insurance and real estate employees between 1974 and the end of 1980 (U.S. Bureau of Labor Statistics, Monthly Labor Review, January 1981).

/12/ Taxable expenditures within the central business district per office worker were \$715 per year in 1974 (SPUR, 1975, see note /8/ above, p. 262). Between 1974 and 1981, average weekly earnings of finance, insurance, real estate and service workers rose nationally about 50%:  $1.50 \times \$715 = \$1072$ .

/13/ Sales tax revenues generated by employees at the existing project site are about \$140 per year. Based on average gross receipts of \$2,400 per month for both the existing restaurants, sales tax revenues allocated to the City and County of San Francisco are about \$290 per year.

/14/ Bruce Bernard, Muni Chief Accountant, oral communication, October 28, 1981. Based on 1981-82 Muni net operating cost of \$142,139,000, and net revenues of \$87,833,000/. Assuming the 1979 revenue passenger number of 139 million would be applicable in 1981, the average general fund deficit per ride would be \$0.39. However, there has not been any update of the ridership number since 1979, therefore, the deficit per ride of \$0.39 is estimated.

/15/ Office of Environmental Review (OER), "Guidelines for Environmental Evaluation - Transportation Impacts", October 1980.

/16/ Assuming 260 work days per year, two rides per day and absenteeism of 10% (holidays, vacations, sick days), each worker will ride an estimated 468 times per year. Therefore, the cost is: 13 workers x 29% ride Muni x 468 rides per year x \$0.39 deficit per ride = \$688.

/17/ San Francisco Ordinance No. 224-81, approved by the Board of Supervisors on April 20, 1981.

/18/ 13 workers x 15% ride BART x 468 rides per year x \$1.50 cost per ride = \$1,369.

● /19/ Cost = 965 employees x 15% ride BART x 468 rides per year x \$1.50 cost per ride = \$101,615. Revenue = \$1,072 taxable sales per employee x 965 employees x .005 BART sales tax x .75 (% of tax to BART) = \$3,879, plus \$615,000 property tax revenue generated by the project x 6.389% to BART = \$39,290 Net deficit = \$101,615 - \$3,879 - \$39,290 = \$58,446.

#### D. TRANSPORTATION, CIRCULATION AND PARKING

##### DEMOLITION, EXCAVATION AND CONSTRUCTION

During the construction period, transportation impacts would result from truck movements to and from the site during demolition, excavation, and construction activity. Demolition and excavation would require about one month each.

Trucks are expected to follow haul routes approved by the Department of Public Works, probably via Montgomery and Clay Sts. to the Embarcadero and James Lick Freeways to Peninsula disposal sites, return trips would probably be via Washington St. Post-excavation construction activity would require truck movements to deliver construction materials. Construction would require about 18 months. The average number of daily truck trips during this period would be about 12, with a maximum of about 40, in or out of the project site between 9:00 a.m. and 4:00 p.m. /1/

● Any truck traffic from 7:00 a.m. to 9:00 a.m. or from 4:00 p.m. to 6:00 p.m. would conflict with peak-hour traffic, particularly at freeway access points. Site access would be via Montgomery St. Materials storage would be provided on site. Sidewalks on the south side of Washington St. and the west side of Montgomery St. would be closed for the construction period. The parking lane on Washington St. and probably the loading zone on Montgomery St., which is a

traffic lane during peak hours, would be closed during construction to allow pedestrian travel under covered walkways in the streets. The elimination of the peak-hour traffic lane on Montgomery St. would result in approximately a 25% reduction of capacity on this street, contributing to congestion. If it were assumed that the loss of a peak-hour traffic lane on Montgomery St. would effectively eliminate an intersection approach lane on Columbus Ave., a worst-case assumption, the volume-to-capacity ratio at the intersection of Montgomery and Washington Sts. with Columbus Ave., would increase from 0.81 (see Table 7, p. 86) to about 0.90. This would represent Level of Service D/E; operating conditions at this intersection would approach capacity during the construction period. (See Appendix D, Table D-1, p. 269 for definitions and volume/capacity ratios for each vehicular Level of Service.) If it were assumed that the entire curb lane on Montgomery St., between Washington and Clay Sts., would be lost during construction, the volume-to-capacity ratio at the intersection of Montgomery and Clay Sts. would increase from 0.72 to about 0.82 (a change from Level of Service C to D). As construction activities would only eliminate a peak-hour traffic lane from Washington to Merchant Sts., the actual increase in the volume-to-capacity ratio at the intersection of Montgomery and Clay Sts. would be less. No bus stops would be affected by project construction.

## PROJECT OPERATION

Travel Demand

Project-generated travel has been estimated based on the number of net sq. ft. of office space and the number of residential dwelling units proposed for the project./2/

The peak hour of project trip generation was assumed to occur during weekday evenings between 4:00-6:00 p.m. During the peak hour, 20% of the daily (24-hour) travel was assumed to occur. The peak-hour modal split (trip distribution) is shown in Table 6. Project travel was assumed to split 42% auto, 55% transit and 3% pedestrian (see Appendix D, Table D-9). The project would generate approximately 3,760 person trip ends during a 24-hour period, or 1,880 round trips, not including lunchtime walking trips or walking trips to the retail uses on the site.

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TABLE 6: PROJECTED PEAK-HOUR WEEKDAY TRAVEL\* DEMAND GENERATED BY THE PROJECT  
(person trip ends)

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<u>Uses</u>	<u>Trip Generation</u>	<u>Total</u>	<u>Auto</u>	<u>Transit</u>	<u>Walk**</u>
195,000 net sq. ft. of office	3.5 per 1000 sq.ft.	680	305	360	15
40 condominium units	0.75 per unit	40	5	30	5
		<u>720</u>	<u>310</u>	<u>390</u>	<u>20</u>

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\* Person trip ends

\*\*Persons who walk to the site without using any other form of transportation. Persons traveling on public transit or by auto to public parking in the area would also arrive as pedestrians.

SOURCE: TJKM, Transportation Consultants

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Because little vacant public parking exists in the area (spaces are estimated to be 96% filled, see p.41), the trips by auto shown in Table 6 would compete with other prior users of public parking, who would then use transit or park

further from the site. In effect, there would be little net increase in auto use in the area. By this reasoning, there would be an additional impact on public transit, over and above the daily trips generated directly by the project, due to the secondary effect of the project's automobile trip generation in displacing other prior users of public parking.

#### VEHICULAR IMPACTS

The highest existing traffic volumes are on the streets leading to the freeways. A capacity analysis of existing volumes on the intersections adjoining the project site indicates that the intersections of Washington and Kearny Sts., Clay and Kearny Sts., and Clay and Montgomery Sts., are operating at vehicular Level of Service C, or better; the intersection of Washington and Montgomery Sts. at Columbus Ave operates at vehicular Level of Service D. (See Appendix D, Table D-1, p. 269, for definitions and volume/capacity ratios for each vehicular Level of Service, and Table D-2, p. 270, for existing traffic volumes on streets in the project vicinity.) The two intersections at the freeway ramps (the intersections of Broadway and Sansome Sts., and Clay and Front Sts.) are operating at Level of Service C or better. Table 7 shows existing peak-hour volume to capacity ratios at intersections in the vicinity of the project site.

The p.m. peak 24-hour automobile travel generated by the project was analyzed. Traffic generation was based on the estimated number of on-site employees. For an estimate of project-generated traffic volume increases on streets immediately surrounding the project, the capacity of the on-site garage was used as the basis; it was assumed that routes of drivers going to other garages would be sufficiently dispersed that they would have a negligible effect on traffic volumes on the adjacent streets

Washington, Montgomery, Clay, and Sansome Sts., which serve the project as feeders to or from freeway ramps, are points of maximum automobile traffic in the Downtown Financial District. They are assumed to represent the "worst case" of traffic impacts. Impacts on other streets would be less, as project traffic on them would be more dispersed.

TABLE 7: ESTIMATED EXISTING PEAK-HOUR VOLUME-TO-CAPACITY (V/C) RATIO  
SUMMARY AT INTERSECTIONS IN THE VICINITY OF THE PROJECT SITE

<u>Intersection</u>	<u>V/C Ratio*</u>	<u>Level of Service**</u>
Montgomery and Washington and Columbus	0.81	D
Montgomery and Clay	0.72	C
Kearny and Washington	0.61	B
Kearny and Clay	0.78	C
Broadway and Sansome	0.71	C
Clay and Front	0.51	A

\*Volume/capacity, where capacity is at Level of Service E.

\*\*See Appendix D, Table D-1, for definitions of Levels of Service.

SOURCE: TJKM, Transportation Consultants, Based on manual intersection counts made on Thursday, July 16, and Monday through Wednesday, July 20-22, 1981.

The project is proposed to have about 62 off-street parking spaces. Although the project sponsor expects to reserve about 40 of the spaces for use by residents, a "worst-case" assumption for traffic generation is that all of the spaces would operate as short-term parking. Under this assumption the spaces are projected to generate approximately 790 vehicle trip ends to or from the site each day./3/

As downtown San Francisco is currently experiencing an increase in office building floor area, the Department of City Planning has initiated an analysis of the cumulative traffic impact of 29 buildings in the vicinity of the proposed project (see Appendix D, Table D-8 p. 275) which are proposed to be occupied after 1980, or which are now under environmental review. The 1984 base traffic volumes, exclusive of the project volumes, were projected by analyzing the traffic increases from these 29 buildings as well as traffic from other developments.

The effect of traffic generated by the project garage on the level of operation of intersections adjacent to the site and on freeway feeder streets during the peak-hour, in terms of volume-to-capacity ratios, is shown in Table 8. The project impact at the four intersections closest to the project site would be a result of traffic using the parking facility proposed by the project and by service-vehicle traffic. The garage has been analyzed assuming short-term use only of the 62 spaces, with a worst-case condition of all spaces emptying onto the streets during the p.m. peak hour. To evaluate net traffic effects, the trips currently generated by the existing 45-space short-term parking facility on the site were subtracted.

- The percentage traffic volume increase caused by the proposed project on the freeway feeder streets, and on streets near the proposed project, above 1984 traffic levels, is estimated to be not more than 4% on any of the freeway approach streets (see Appendix D, Table D-3, p. 271, for projected vehicular volumes). The total addition to Bay Bridge traffic caused by the project would be fewer than 50 vehicles in the peak p.m. hour. The impact of the project would be an imperceptible lessening of the Level of Service of traffic operation on the City street and regional highway systems. There would be a proportionate increase in pedestrian-auto conflicts in the Montgomery/Washington/Columbus intersection due to the increase in the number of pedestrians. As shown in Table 8, the level of operation would not be decreased by more than 1% of the 1984 base conditions by the project traffic.

#### PARKING IMPACTS

Existing on-street parking on the block faces containing the project site consists of 12, 30-minute metered spaces, on Washington St. Observations during daytime hours indicate a high usage of the metered spaces with a moderate turnover of parked vehicles./4/ Approximately 44% of the vehicles remained in the spaces longer than the 30-minute metered time limit; during the p.m. peak hour, all of the spaces in the block were occupied. Use of the loading zones was also shown to be high, with approximately 25% of the vehicles remaining longer than one hour in the zones. The Montgomery St. site frontage is a commercial-vehicle loading zone. Average duration of stay in the loading zones was approximately 30 minutes per vehicle. The overall

TABLE 8: PROJECTED P.M. PEAK-HOUR INTERSECTION VOLUME-TO-CAPACITY (V/C) RATIOS NEAR THE PROJECT SITE IN 1984

<u>Intersection</u>	<u>1984 Base</u>		<u>1984 Base + Project</u>	
	<u>V/C</u>	<u>LOS*</u>	<u>V/C</u>	<u>LOS*</u>
Montgomery & Washington	0.82	D	0.83	D
Montgomery & Clay	0.73	C	0.74	C
Kearny & Washington	0.61	B	0.62	B
Kearny & Clay	0.78	C	0.79	C
Clay & Front	0.60	A	0.61	B
Sansome & Broadway	0.77	C	0.80	C

\* See Appendix D, Table D-1, for definitions of Levels of Service.

SOURCE: TJKM, Transportation Consultants

conclusion which may be drawn from these numbers is that demand for short-term parking in the area presently exceeds the supply, and that illegal parking occurs.

● The daily parking demand which would be generated by the office portion of the project is projected to be about 290 parking spaces, 240 long-term and 50 short-term. The parking demand has been calculated based on the projected number of auto trips./3/ The project would provide 62 on-site parking spaces. About 40 spaces would be for the residential portion of the building. The remaining 22 spaces would be designated as short-term spaces for the commercial portion of the project. The project would eliminate 45 existing parking spaces, a net loss of 23 spaces available for commercial use. The parking demand which would be generated by the office portion of the building, plus the net loss of parking caused by the project would result in an on-site deficit for the project of about 310 spaces.

Because the project incorporates residential units, the City Planning Code (Section 151) requirement of one off-street parking space per four dwelling units in the C-3-0 District, would mean that 10 of the 62 spaces proposed would be required for the use of building residents. If all of the remaining 52 parking spaces were designated as short-term spaces, the project would satisfy the estimated short-term parking demand generated by the project. Were 42 of the spaces to be designated for short-term parking and the remainder for project residents, the short-term parking deficit would be about eight spaces. Were fewer of the spaces designated for short-term parking and more for use by residents, the short-term parking deficit would increase.

The parking demand from each of the 29 buildings analyzed to project 1984 base conditions was calculated. Long-term demand from the 29 projects would be expected to be about 13,310 spaces per day, and average short-term demand would be about 2,075 spaces per hour. The project demand (240 spaces long-term, 50 spaces short-term) would represent about 1.8% of the increased long-term demand and about 2.4% of the increased short-term parking demand from the 29 buildings (see Appendix D, Table D-8, p. 275, for a list of buildings included in the cumulative analysis).

Current City policy, as stated in the Revisions to the Transportation Element of the Master Plan Regarding Parking (1977), is to "encourage short-term use of existing parking facilities within and adjacent to the downtown core by converting all-day commuter parking to short-term parking in areas of high demand or to car/van pool parking where short-term parking demands are low."/5/ Under this policy, there is a potential for approximately 13,000 off-street spaces within 2,000 ft. of the project site to be converted to short-term-only parking. This would displace a large number of long-term parkers currently using parking facilities in the downtown core.

- The long-term parking demand from the 29 buildings and the proposed project would be added to any long-term parkers displaced by the Master Plan Parking Policy. This could cause several changes in driver behavior. Some drivers might park at greater distances, west beyond Mason St., south beyond Market St., or north beyond Green St., and either walk or use Muni to reach the downtown core. In the years following 1984, as further office expansion occurs, particularly in the Yerba Buena Center Redevelopment Area, this option would be foreclosed because of expanded parking demand, unless a large expansion of parking supply, greater than the expansion of parking demand, were to occur in the South-of-Market area. Some other streets where displaced long-term parkers might wish to park now have, or may have, residential permit parking, restricting parking to permit holders. Cumulative development, including the project, might increase demand for preferential parking in residential areas which experience the impacts of overflow parking from the Financial District.

Imbalances in the potential long-term parking demand and supply could encourage the use of car pools and van pools, or the creation of satellite parking facilities in outlying areas, such as the South-of-Market area and the periphery of the Downtown Commercial District./5/ Shuttle or expanded Muni service to the downtown area might be provided, or direct use of transit from home (San Francisco) or from suburban centers (East Bay, North Bay, Peninsula) could increase. Peninsula residents, for example, could find Southern Pacific commuter trains more attractive if they could get no closer to downtown with their cars than the train terminal at Fourth and Townsend Sts. All transit options would add to the burdens of the regional and local transit system, particularly Muni.

#### TRUCK DELIVERIES AND LOADING

The project is proposed to have service vehicle access on the second-floor level of the building via a ramp from Merchant St. Two loading bays would be provided, as required by the City Planning Code, Section 152. The bays would be sized to handle standard single unit trucks and smaller vehicles. Analysis of the ramp and mezzanine geometry indicates that single-unit trucks and large delivery vans would be able to negotiate the ramp into the loading area. Semi-trailer trucks would not be able to use the loading bays, and would be expected to unload from Merchant, Montgomery or Washington Sts.

Project demand would be for about four loading spaces./6/ The project would not meet the average demand for loading space with off-street loading facilities, as proposed. The existing loading zones on the Montgomery St. frontage would be able to handle the excess demand. However, due to the possibility of illegal parking in the loading zone, double parking might occur.

Access to the project's freight elevator from the loading docks would be provided via an accessway to the core of the building. The loading dock would be separated from the freight elevator by about 100 ft. of parking area. There would be direct access from the freight elevator to the building lobby and street-level uses.

● Access to the on-site passenger vehicle parking areas is proposed via Merchant St. A ramp to the garage, at a grade of 1:10, is proposed from Merchant St. and would provide sufficient maneuvering space for passenger vehicles. Delivery vehicles improperly using the loading area could block access to the ramp and/or prevent vehicles from entering or leaving parking spaces on the mezzanine level. There would be a full-time (at least 12 hours a day) garage attendant to insure proper use of the loading area and garage.

#### TRANSIT IMPACTS

Regional transit carriers, Southern Pacific Railroad, AC Transit, and Golden Gate Transit, are operating during their peak hours at less than 100% of their seated capacity in San Francisco. Muni, SamTrans and BART exceed seated capacity during peak hours. In the experience of most carriers, the p.m. peak is more intense than the a.m. peak./7/ Some Muni lines operate for a portion of the p.m. peak hour with passenger loads in excess of the recommended maximum, which is about 150% of seated capacity for trolley and motor coaches. Under these conditions passenger loading times are increased; schedule adherence and passenger comfort are adversely affected. Although the other carriers operate at less than seated capacity during a one-hour period, specific routes are shown to experience peak-of-the-peak loadings in excess of seated capacity for periods from five to 30 minutes during the peak hour.

An analysis was made of the cumulative transit impacts attributable to development in Downtown San Francisco. For all systems except the Muni, the analysis was conducted on a system level which considered the lines or groups of lines that serve the project area. For the Muni, a line-by line analysis was conducted according to the Department of City Planning guidelines./2/

Increased transit ridership from 29 proposed downtown developments was included in the 1984 base values (see Appendix D, Table D-8, p. 275). In addition, growth from other developments not specifically analyzed was considered through the use of a growth factor. The ridership from the projects was added to the estimated 1984 base ridership, and the demand-to-capacity ratios, or load factors, attributable to the project were determined.

As shown in Table 9, project ridership during the p.m. peak hour would not increase the transit loading by more than 0.3% on any of the non-Muni systems. This would not be a statistically significant change./8/ Analysis of the transit data leads to a reasonable assumption that for short periods of time (15 to 30 minutes) certain routes experience loadings nearer to 100% of total capacity than the loadings shown in Table 9. The loadings shown are the result of averaging ridership of full vehicles with partially empty vehicles, thus equalizing the loads over the one-hour period. As the cumulative demand increases, the length of time of peak loadings will increase, thus forcing a spreading of peak-of-the-peak conditions over time.

Of the 53 Muni lines serving the Downtown San Francisco area, roughly bounded by Brannan St., 11th St., Van Ness Ave., and Clay St., 36 operate within a walking distance radius of 2,000 ft. of the site (see Appendix D, Table D-10, p. 277, for Muni line analysis). With trips to be generated by the 29 developments referred to above, it is estimated that 26 of these lines would operate during the p.m. peak hour in 1984 beyond maximum recommended capacity (beyond 150% of seated capacity)./9/ Total ridership on these 36 lines would then be about 34,300 during the peak hour. The project would contribute about 150 peak-hour trips to these lines, representing a less than 1% increase. If prior users of existing public parking on-site were to switch to transit, the total number of new peak-hour trips attributed to the project would be 340, about a 1% increase.

#### PEDESTRIAN IMPACTS

The sidewalks serving the project site presently have unimpeded levels of pedestrian activity during the noon hour and the morning and evening peak periods. The crosswalks have moderate levels of activity. The pedestrian flows during the p.m. peak are generally more intense than those in the a.m. peak, and noon hour flows are generally equivalent to, or more intense than, the p.m. peak flows (see Appendix D, Table D-4, p. 272, for a description of pedestrian flow regimes). Pedestrian travel in crosswalks conflicts more with vehicular traffic during the p.m. peak traffic period than at the noon hour. Appendix D, Tables D-5 & D-6, p. 273, show existing 15-minute peak pedestrian flows and operating conditions on the sidewalks fronting the site.

TABLE 9: PROJECTED 1984 PEAK OUTBOUND TRANSIT CHARACTERISTICS  
BASED ON CALCULATED GROWTH FACTORS

Agency	1984 Base*		1984 Base + Project		Diff.	% Inc.***
	Rider-	%	Rider-	%		
	Ship	Occ**	Ship	Occ		
MUNI****	33,300	---	33,480	---	180	0.7
BART						
Transbay	14,195	108	14,235	108	40	0.3
Westbay	8,250	86	8,280	86	30	0.3
A-C Transit	12,320	99	12,350	99	30	0.3
SamTrans	1,515	129	1,520	130	5	0.3
SPRR	6,020	55	6,040	55	20	0.3
Golden Gate						
Motor Coach	6,670	99	6,690	100	20	0.3
Ferry	1,555	75	1,560	75	5	0.3

\* Outbound only; this represents a 32% increase in transit ridership over existing conditions due to cumulative development and transit growth, (see Appendix D-7)

\*\* Percent of total capacity occupied.

\*\*\* Percent increase in projected 1984 Base ridership due to project

\*\*\*\* Load factors have not been included for the Muni system as a whole due to the lack of reliable data. Load factors for Muni are handled on a line-by-line basis (see also Appendix D, Table D-10, p. 277) rather than system-wide.

SOURCE: Environmental Science Associates, based on information supplied by TJKM, Transportation Consultants

The Montgomery St. sidewalk pedestrian flow presently operate in unimpeded conditions during the noon and p.m. peak hours. The Washington St. pedestrian flows operate in unimpeded conditions during the noon hour.

The crosswalk in the west side of Montgomery St. across Washington St. operates at about 25-30% of capacity during the p.m. peak. On the south side of Washington St., the crosswalk across Montgomery St. operates at about 10% of capacity. Reservoir space requirements for people waiting to use the crosswalks do not block pedestrian flows on the sidewalks.

The project would increase pedestrian activity on the sidewalks fronting the site, and increases are also expected to occur as a result of future development in the project vicinity. Table 10 shows the pedestrian levels of operation for the projected 1984 conditions. The values shown in Table 10 for the 1984 Base conditions include applicable increases from the 29 buildings representing cumulative downtown development. Existing effective sidewalk width has been assumed for the future conditions.

The primary pedestrian access to the project would be on Montgomery St. The project would also be accessible from Washington and Merchant Sts. The addition of cumulative pedestrian travel would cause the p.m. peak-hour flows on Washington and Montgomery Sts. to cross into the next flow regime. The flow on the Montgomery St. sidewalk along the project site would become impeded; pedestrians would retain some freedom of walking speed, but indirect conflicts would occur. The project would cause an approximately 40% increase in the number of pedestrians on the sidewalks fronting the project during the p.m. peak hour.

The project would provide a pedestrian plaza/arcade and widened sidewalks along the Montgomery St. and Washington St. frontages. Access between Merchant St. and Washington St. would also be provided through the project.

#### NOTES - Transportation

/1/ The data for truck trips during the demolition, excavation, and construction periods are from Williams and Burrows, General Contractor, Belmont, California, letter communication, July 20, 1981.

TABLE 10: PROJECTED P.M. PEAK 15-MINUTE PEDESTRIAN VOLUMES IN 1984  
(Project Side of Street)

Sidewalk	1984 Base			1984 Base + Project		
	Volume* P.M.	Rate** P.M.	Flow Regime*** P.M.	Volume P.M.	Rate P.M.	Flow Regime P.M.
Montgomery St.	235	2.2	Impeded	325	3.1	Impeded
Washington St.	100	0.8	Unimpeded	160	1.2	Unimpeded

\*Pedestrians per 15 minutes per foot of effective sidewalk width.

\*\*Pedestrians per minute per foot of effective sidewalk width.

\*\*\*See Appendix D, Table D-4, p. 272 for definitions and volume criteria.

SOURCE: TJKM, Transportation Consultants

/2/ Trip generation, purpose, and regional distribution were obtained from Attachment 1. of the "Guidelines for Environmental Impact Review, Transportation Impacts", San Francisco Department of City Planning, October 1980. Travel mode assignments were made using Attachment 2., and the Muni analysis using Attachment 3., of this document. Residential trip generation was estimated from Report on Trip End Generation Research Counts (Vols. 1-12) CalTrans District 4, 1966-1980. Rates have been adjusted from vehicle trip ends to person trip ends based upon an assumed vehicle occupancy of 1.4 persons per vehicle.

/3/ To estimate the commuter or long-term parking demand, all of the auto driver work trips were assumed to generate demand for one parking space per trip or 240 spaces for the project. The non-work or short-term parking demand was calculated by dividing the non-work auto driver trips by a turnover factor based upon the average length of stay. The turnover factor was calculated by dividing a 9-hour working day by the average length of stay of 1.4 hours to give a factor of 6.4. Thus the average short-term (non-work) parking demand was calculated to be 50 spaces per hour for the project.

/4/ The parking inventory survey was conducted by TJKM, Transportation Consultants on January 20-23 and 26, 1981 and July 20-22, 1981.

/5/ Revisions to the Transportation Element of the Master Plan Regarding Parking, Resolution 7647, San Francisco Planning Commission, January 20, 1977.

/6/ Center City Circulation Program: Pedestrian Circulation and Goods Movement, Working Papers 1, 2, and 3 and Final Report, San Francisco Department of City Planning, 1980.

/7/ See Appendix D, Tables D-7 and D-9, taken from the 1981 Transportation Impact Study for the Montgomery/Washington Building, by TJKM Transportation Consultants for a more detailed breakdown of transit ridership characteristics.

/8/ The Transportation analysis can be considered accurate to within 10%. Thus, changes of less than 10% cannot be considered to be statistically significant.

/9/ The 36 affected Muni lines would be the 1, 1X, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12, 14, 14GL, 14X, 15, 21, 27, 30, 30X, 31, 31X, 38, 38L, 38AX, 38BX, 42, 45, 55, 71, 72, 80X, 83, J, K, and N.

#### E. AIR QUALITY

Air quality impacts associated with project operation would result primarily from vehicle emissions. Daily emissions in 1985, of pollutants resulting from project-related vehicular combustion, have been calculated and are shown in Table 11.

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TABLE 11: PROJECTED DAILY PROJECT-GENERATED EMISSIONS IN 1985 (tons/day)  
COMPARED WITH REGIONAL PROJECTIONS

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	Project Vehicular Combustion*	1985 Projected Regional Emissions**
Carbon Monoxide	0.383	3,367
Hydrocarbons	0.033	797
Nitrogen Oxides	0.039	692
Sulfur Oxides	0.006	435
Particulates	0.004	192

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\*BAAQMD, 1979, EMFA 5 Vehicular Emission Factors.

\*\*Association of Bay Area Governments (ABAG), BAAQMD, MTC, 1979, 1979 Bay Area Air Quality Plan, pp. 62-64. The region is the nine-County Bay Area Air Quality Management District.

SOURCE: Environmental Science Associates, Inc.

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Roadside carbon monoxide (CO) levels were analyzed for worst-case meteorologic and dispersion conditions for streets carrying project-generated traffic; the results are shown in Table 12. The largest increase in CO concentrations due to the project, about 1% over the cumulative base case, would occur on Sansome St., between Pacific St. and Broadway. The highest eight-hour concentration, 8.8 ppm, would occur on Clay St. between Front and Davis Sts. No air quality standards are expected to be exceeded as a result of the project.

Operational emissions would result from natural gas combustion for space and water heating for the building and would occur at roof level. These emissions (primarily nitrogen oxides) would be negligible, relative to emissions from traffic. Electrical energy consumption would place an increased demand on local generation plants, possibly resulting in greater emissions from these facilities. No local impacts at the site would occur, although the regional burden of pollutants would increase.

TABLE 12: PROJECTED LOCAL ROADSIDE CARBON MONOXIDE IMPACTS\*  
(parts per million - ppm)

Street	Averaging Time	1981	1984 Base**	1984 Base** plus project
Washington (Between Sansome and Montgomery)	1-hour	18.0 ppm	13.9 ppm	14.0 ppm
	8-hour	9.8***	7.5	7.6
Montgomery (Between Washington and Clay)	1-hour	18.9	14.6	14.8
	8-hour	10.7***	8.2	8.3
Clay (Between Front and Davis)	1-hour	19.5	16.5	16.7
	8-hour	11.0***	8.8	8.8
Sansome (Between Pacific and Broadway)	1-hour	18.2	14.4	14.6
	8-hour	9.2***	7.1	7.2

\* Calculations were made for worst-case dispersion meteorology according to BAAPCD (now BAAQMD), 1975 Guidelines for Air Quality Impact Analysis of Projects, Updated for EPA Supplement 8 Emissions Rates, 1978.

\*\* Cumulative Downtown Development; Base includes 0.2% non-analyzed growth.

\*\*\* Values exceeding the applicable standard (35 ppm for one hour, 9 ppm for eight hours).

SOURCE: Environmental Science Associates, Inc.

Although not classified with regard to attainment status for lead standards, San Francisco last exceeded the federal ambient lead standard in 1977 (see Appendix E, Table E-1, p. 277); the major source of this lead is gasoline fuel. Traffic generated by the project would increase exhaust emissions of lead in proportion to the increase in vehicle-miles traveled. Regional ambient lead concentrations are expected to decrease in the future, as use of leaded gasoline decreases.

In summary, the project would add to local and regional accumulations of CO, hydrocarbons and nitrogen oxides, particulates, and sulfur oxides during adverse meteorological conditions. The recently adopted regional Air Quality Plan found that ozone, formed from hydrocarbons and nitrogen oxides, would continue to be a problem in the future, and that substantial reductions in hydrocarbon emissions would be necessary to attain and maintain the ozone standard in the Bay Area./1/ CO and particulates are also problems on a local scale. Because the project would increase emissions of hydrocarbons, CO, and particulates, attainment of the standards would be impeded. The project would probably have no measurable impact on citywide or regional concentrations or on the frequency of violations of the standards. Cumulative development could increase ambient concentrations and the frequency of standard violations, if the control strategies for other emission sources that are envisioned in the Air Quality Plan are not implemented.

The project's interior air quality would be controlled by a variable air-volume ventilation system and would provide about six air changes per hour. Air for ventilation would consist of a filtered mixture of outside air and recirculated air, and would maintain or surpasss applicable outdoor air quality standards./2/

#### NOTES - Air Quality

/1/ ABAG, BAAQMD, and the Metropolitan Transportation Commission (MTC), January 1979, 1979 Bay Area Air Quality Plan, San Francisco Bay Area, Environmental Management Plan.

/2/ Robert Woods, Yoshpe Engineers, oral communication, October 26, 1981

F. CONSTRUCTION NOISE

Project construction would occur in three stages: demolition, site excavation, and construction. Throughout the 18-month construction period, trucks would initially haul away dirt and debris and then bring in building materials. Construction activities would temporarily increase noise levels at the site by 10 to 15 dBA.

The project would be expected to use a mat (cellular) foundation, which would not require pile driving. During construction, all powered equipment other than impact tools must comply with the San Francisco Noise Ordinance, which limits noise emissions to 80 dBA at a distance of 100 ft.

The Noise Ordinance prohibits construction work at night from 8:00 p.m. to 7:00 a.m., if noise from such work exceeds the ambient noise level by 5 dBA at the property line, unless a special permit is authorized by the San Francisco Department of Public Works. During construction, many types of equipment are used. Typical demolition and construction noise levels anticipated for the project are shown in Table 13.

● The Holiday Inn, adjacent to the site, would be the most sensitive receptor of construction noise. Although the hotel wall facing the site is constructed of at least one-ft.-thick concrete, the hotel rooms nearest the project site would be subjected to interior noise levels of about 65 dBA during periods of excavation and exterior finishing (a total of about 10 months). Noise at this level would interfere with speech and sleep. Noise levels in the adjacent 601 Montgomery St. and Transamerica buildings could reach as high as 65 dBA, with windows closed, and would average about 60 dBA. Such noise levels would interfere with human speech and concentration, distracting employees and requiring raised voices to communicate. Presently, the interior noise levels in buildings adjacent to the site are estimated to be about 45 dBA, with peak incidental noise levels determined by interior activity.

TABLE 13: TYPICAL COMMERCIAL/INDUSTRIAL CONSTRUCTION NOISE LEVELS AT 50 FEET

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<u>Construction Phase</u>	<u>Average Noise Level</u>
Ground clearing	84 dBA
Excavation	89
Foundations	78
Erection	85
Finishing	89

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SOURCE: Bolt, Beranek, and Newman, December 31, 1971, Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances, U.S. Environmental Protection Agency, p.20.

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#### G. ENERGY

PG&E obtains a portion of its electrical energy from renewable resources including geothermal and hydroelectric power, but will meet new demands for energy primarily by increasing the use of nonrenewable coal, oil, natural gas and nuclear fuels. Among the new power plants which are anticipated by PG&E in the near future are the Diablo Canyon nuclear power plant in San Luis Obispo County and new geothermal plants in the Mayacmas Mountains. In response to a directive of the State Public Utilities Commission, PG&E will also be required to increase generating capacity from co-generation projects, which generate electricity in combination with industrial processes that already use fossil fuels as a source of heat. PG&E also anticipates increased purchases of electricity from other utilities; this power would come primarily from hydroelectric and nuclear power plants in the state of Washington.

During the construction period, an estimated energy consumption of about 440 billion British Thermal Units (Btu) at-source would be required./1/ This

value is equivalent to about 74,800 barrels of oil (bbl/oil) and includes the energy required for fabrication and distribution of materials, as well as direct energy consumption. Direct energy consumption at the site would represent approximately 18% of total construction energy consumption. An estimated 78 billion Btu at-source (13,200 bbl/oil equivalents) would be consumed for site excavation, transportation of materials and building construction.

The project would meet State energy conservation requirements, established by the California Energy Commission./2/ The proposed structure has passed the Prescriptive Envelope Test indicating conformance with Title 24./3/ As the project passed the Envelope Test, Title 24 states that a budget analysis would not be required. Projected total energy use for the project would be 175,000 Btu at-source per sq. ft. per year. The air distribution system would be a variable air volume circulation system and would provide individual zone control. Each floor would be equipped with an individual fan system for use during business hours.

The internal heat generated by the project would be reclaimed by the use of a fan/coil unit at each floor which would deliver warm air to the building perimeter to replace heat lost through the building skin. Only if reclaimed heat were insufficient to maintain comfort levels would the building's hot water space heating system be used. Air conditioning would consist of a central mechanical water-chilling plant with energy management controls to optimize load demand. The cooling tower would be used for pre-cooling operations. The air conditioning would be used only after the cooling capabilities of the cooling tower water were exhausted. Air conditioning for condominiums would be by closed circuit water-to-air heat pumps. Heat rejection produced by the office lights and computer would be made available through heat exchangers to augment the heating of the condominiums.

The electrical system of the office portion of the project would have load-shedding capability. That is, during peak periods of electrical demand when PG&E is in danger of brownouts, the project could systematically shut off the circulation fans and other electrical connections for several minutes as

necessary. The fans and other electrical connections could then alternately be turned on and off, by floor, to sustain this load reduction.

The project would provide an electrical lighting level of 65 to 75 footcandles, with emphasis on task lighting./4/ The northeast corner of the project would contain a series of setbacks and consist of a glass facade. This portion of the building would not receive direct sun during most periods, and would thus allow extensive use of natural lighting in this portion of the building, decreasing the need for artificial lighting without increasing cooling requirements. The project would include a rooftop swimming pool which would use waste heat from the office portion of the building. The condominiums would all include operable windows as a further energy conservation measure. Estimated project energy consumption is shown in Table 14.

The project would have a connected kilowatt load of 2,229 and 851 kilowatts for the office and condominium portions of the building, respectively./5/ The office portion of the building would require about 399,000 kilowatt hours (KWH) per month, the equivalent of about 695 barrels of oil, and 4.8 million KWH or 8,340 barrels of oil equivalents per year. This represents an electrical demand of about 20 KWH per sq. ft. per year as compared to an estimated average electrical demand of 19 KWH per sq. ft. per year for other typical highrise office buildings recently proposed in San Francisco./6/ Peak at-source electrical demand for the offices would be about 1880 KWH or 19.2 million BTU at-source (3.3 barrel of oil equivalents.) This peak would occur at 4:00 p.m. on mid-July afternoons and would not coincide with the PG&E system-wide (northern California service area) peak demand period which occurs on August afternoons. Estimated average daily and annual electrical distribution curves are shown in Figures 25 and 26, p.104 - 105.

The condominiums would require 450,000 KWH per year (the equivalent of 790 barrels of oil), or about 37,500 KWH per month, an electrical demand of about 6.7 KWH per sq. ft. per year. Peak at-source electrical demand would be 170 KWH, equivalent to 1.7 million at-source BTU, or 0.3 barrels of oil. This would occur at 6 p.m. on December evenings and would not coincide with the PG&E peak which occurs in August.

TABLE 14: ESTIMATED ANNUAL PROJECT ENERGY CONSUMPTION

OFFICE	Units of Energy (in Thousands)	At-Source Resource Use (billions of BTU)*	Barrel Oil Equiv. (BBL. Oil)
Electricity	4,790 KWH	49.02	8,340
Natural Gas	3,620 cu. ft.	3.98	680
Gasoline**	200 gal.	28.00	4,760
<u>CONDOMINIUMS</u>			
Electricity	450 KWH	4.61	790
Natural Gas	2,070 cu. ft.	2.28	390
Gasoline**	2.5 gal.	<u>0.35</u>	<u>60</u>
	TOTAL PROJECT	88.24	15,020

\*1 KWH = 10,239 at-source BTU

1 cubic foot = 1,100 at-source BTU

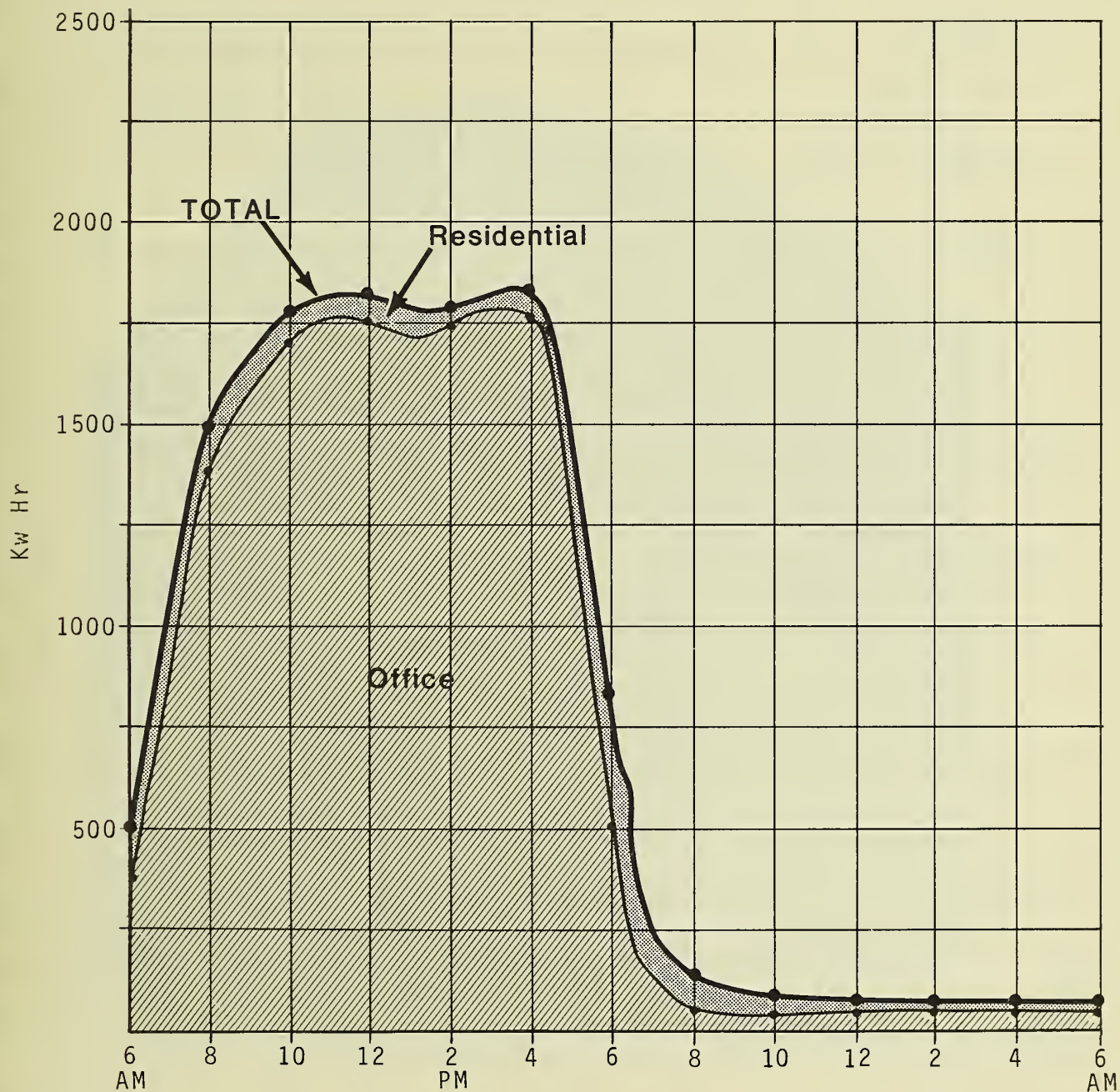
1 gallon = 140,000 at-source BTU

1 BBL. Oil = 5.88 million at source BTU.

\*\*for vehicular trips generated by the project

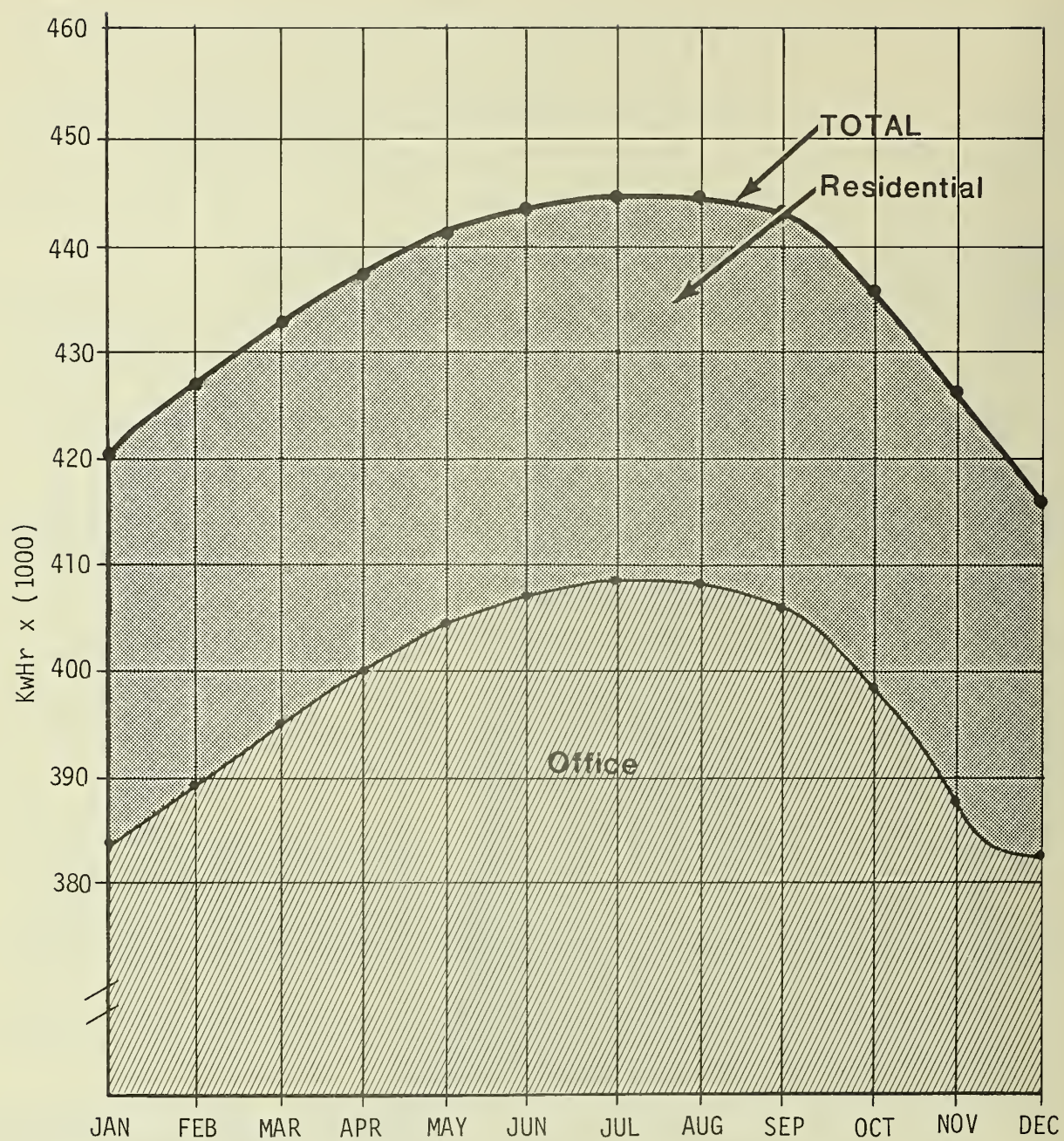
SOURCE: Environmental Science Associates, Inc. and Yoshpe Engineers

The project would require a total of about 5.7 million cu. ft. of natural gas per year, 3.6 million for offices and 2.1 million for the condominiums. Estimated monthly natural gas use for the offices would be about 300,000 cubic ft. or 0.3 billion BTU. This represents a consumption of about 15 cu. ft. per sq. ft. per year as compared to a projected average of 26 cu. ft. per sq. ft. per year for recently proposed high-rise buildings in San Francisco, or 11 cu. ft. per sq.ft. less for the project. Peak demand for natural gas for the office portion of the building would be about 4,400 cu. ft. per hour, equivalent to 0.8 barrels of oil, and would occur at 6:00 a.m. on weekday



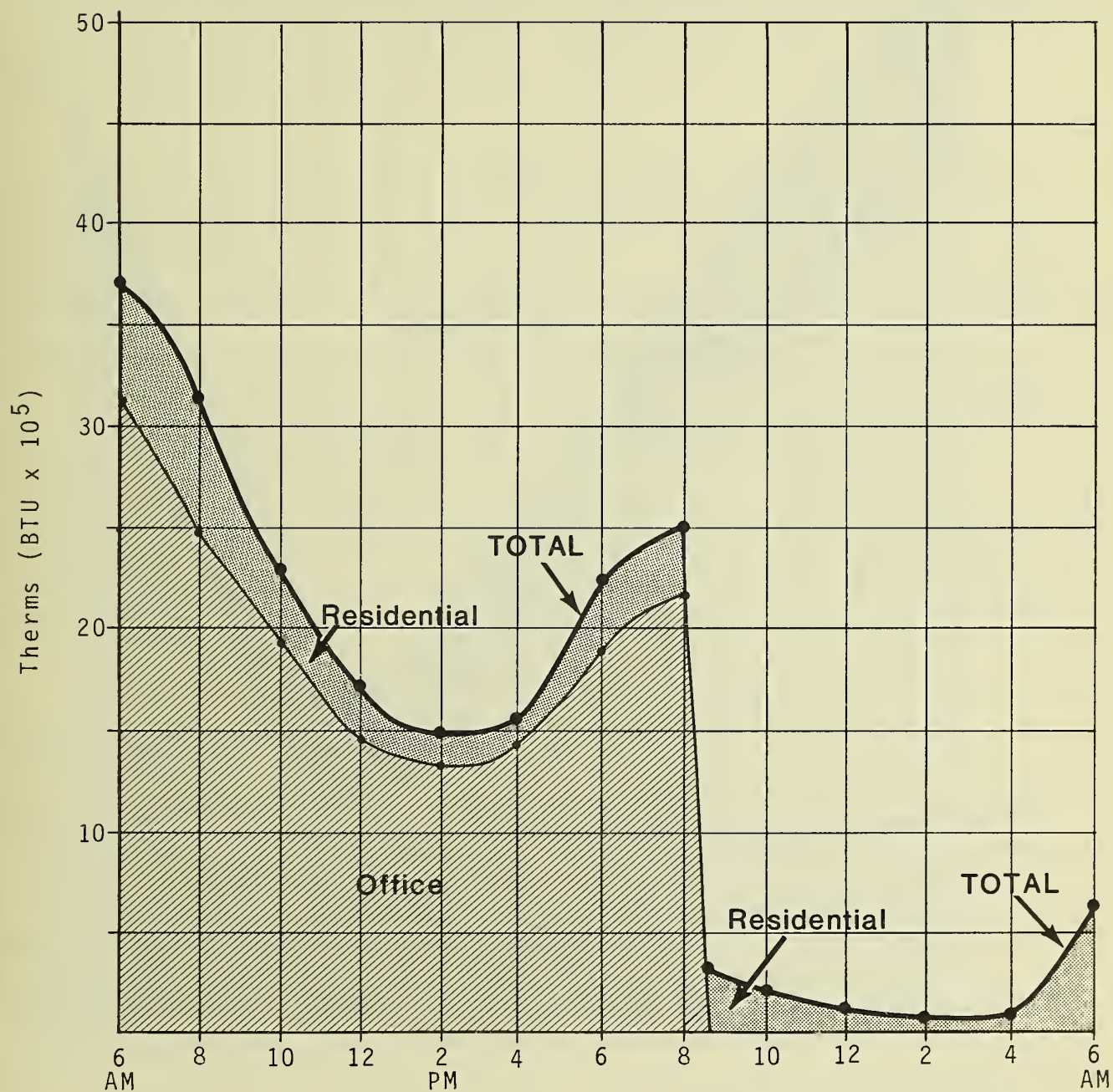
SOURCE: Environmental Science Associates, Inc. and Yosphe Engineers

FIGURE 25: Estimated Average Daily Electrical Load



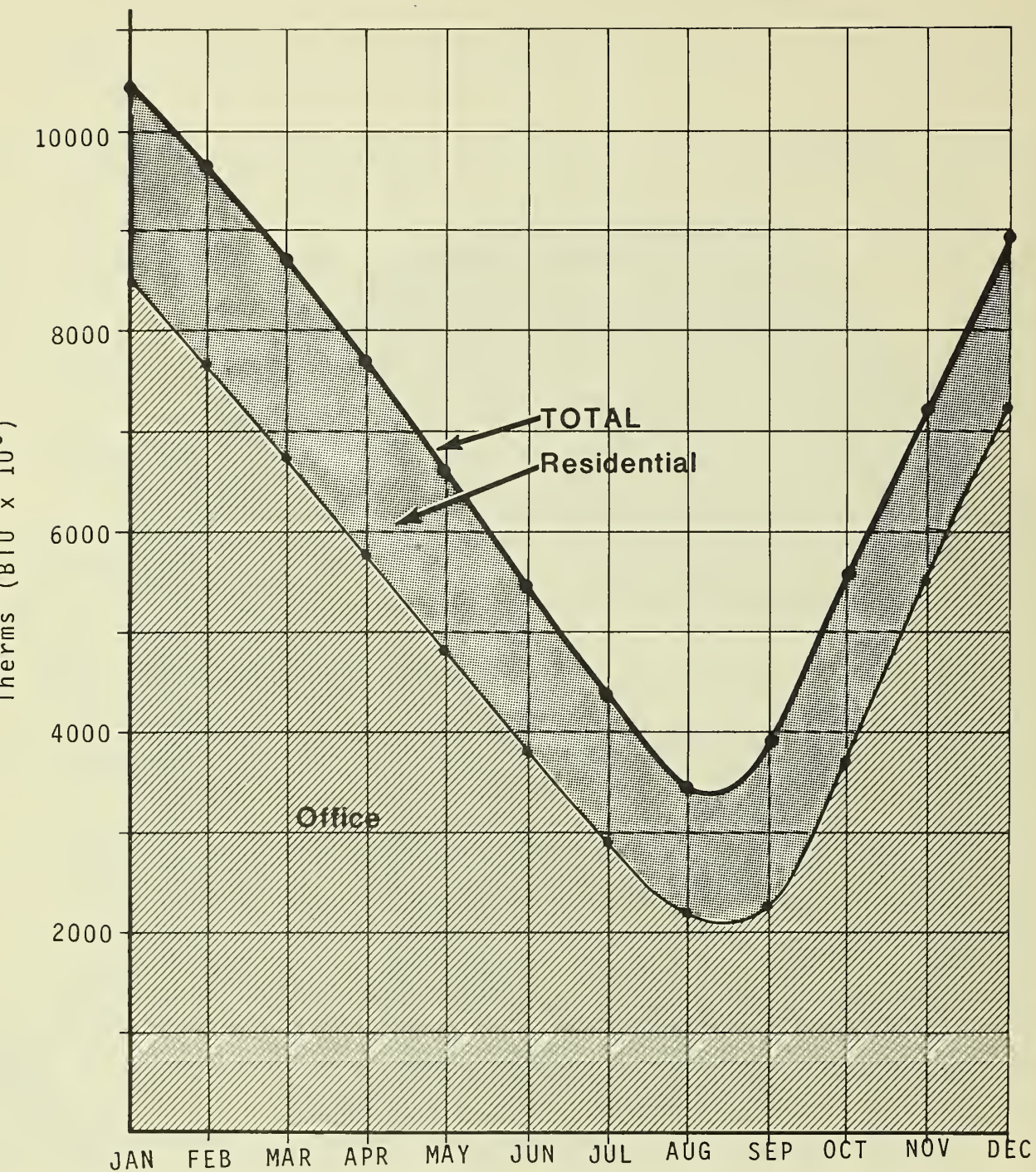
SOURCE: Environmental Science  
Associates, Inc. and  
Yosphe Engineers

FIGURE 26: Estimated Annual  
Electrical Load



SOURCE: Environmental Science Associates, Inc. and Yosphe Engineers

FIGURE 27: Estimated Average Daily Natural Gas Consumption



SOURCE: Environmental Science Associates, Inc. and Yosphe Engineers

FIGURE 28: Estimated Annual Natural Gas Consumption Curves

mornings in January. This would not coincide with the PG&E (northern California service area) system-wide peak period for natural gas which occurs in the early evening hours in January. Estimated annual and average daily natural gas distribution curves for the project are shown in Figures 27 and 28, pp. 106 - 107.

The condominiums would consume an estimated 175,000 cubic ft. (0.2 billion BTU) of natural gas per month. This represents consumption of about 32 cu. ft. per sq. ft. per year of natural gas. Peak demand for natural gas would be about 3,600 cu. ft. per hour and would occur at 6:00 a.m. on February mornings; this would not coincide with the PG&E evening January peak period.

The projected increase in vehicle fuel use for the traffic generated by the project would total about 200,000 gallons of gasoline per year (about 28 billion BTU at-source, or 4,800 barrels of oil). This projected use is based upon the mix of vehicles expected in California in 1985. In general, statewide vehicle fuel use is expected to decrease until 1995 as the vehicle fleet becomes more efficient, and fuel more expensive.

#### NOTES - Energy

/1/ Btu, British thermal unit, A standard unit for measuring heat. Technically, it is the quantity of heat required to raise the temperature of one pound of water 1 degree Fahrenheit (251.98 calories) at sea level. The term 'at-source' means that adjustments have been made in the calculation of the Btu energy equivalent to account for losses in energy which occur during generation and transmission of the various forms of energy as specified in: ERCDC, 1977, Energy Conservation Design Manual for New Nonresidential Buildings, Energy Resources Conservation and Development Commission, Sacramento, CA; and Apostolos, J.A., W.R. Shoemaker, and E.C. Shirley, 1978, Energy and Transportation, Sacramento, CA. (Project 20-7, Task 8).

/2/ California Energy Commission, July 26, 1978, Regulations Establishing Energy Conservation Standards for New Residential and new Nonresidential Buildings, Title 24 of the California Administrative Code.

/3/ Dan Yoshpe, Yoshpe Engineers, oral communication, October 7, 1981.

/4/ One footcandle is the amount of light produced by one candle at a distance of one foot.

/5/ Connected kilowatt load is the total load of all electrical facilities in the building if they were to operate at the same time.

/6/ Five Fremont Center FEIR, (EE 80.268, Certification Date March 12, 1981) Comparisons are based upon the projected energy uses for high-rise office buildings proposed since 1975, the year the State Energy Commission began to regulate energy use in nonresidential buildings.

#### H. GROWTH INDUCEMENT

The project would add about 200,000 net leasable sq. ft. of office space and 4,000 sq. ft. of retail/restaurant space; about 1,200 sq. ft. of restaurant space would be removed from the Financial District. Employment at the site would increase by about 950, from about 10 to about 960. Occupants are not presently known, but would probably include tenants expanding or relocating from other San Francisco locations, tenants relocating from outside San Francisco, and firms new to the Bay Area. Therefore, the increase in employment at the project site would not necessarily represent employment that is new to San Francisco. If the building were fully leased and the office space provided by the project did not create permanent vacancies in other San Francisco office buildings, total employment in San Francisco would eventually increase directly by about 950 jobs due to the project. Approximately 1,140 additional jobs would be indirectly supported in San Francisco through the multiplier effect (see Section IV., Employment, Housing, and Fiscal Factors, p. 71).

This overall growth would be in response to the increasing demand for office space in San Francisco's Financial District. This demand would exist whether or not the proposed project were built. The demand for office space continues the trend of strong growth in service sector and headquarters office activities and employment in San Francisco. The increases in downtown office space and employment would contribute in turn, to continued growth of local and regional markets for goods, services and housing.

It is expected that some downtown workers would desire to live in San Francisco. Employment growth, however, may not directly correspond to increases in demand for housing and City services to residents, as some new jobs would be held by individuals who already live in the City but who

previously either did not work or worked outside the City, or by those who prefer to live in surrounding communities or by those who would not be able to afford or locate housing in the City.

Any net increase in employment downtown would increase the demand for retail goods and food services in the area. By increasing office employment, the project would intensify the demand for retail goods and food services. Some of this demand would be met by the proposed 4,000 gross square feet of retail/restaurant space on the ground floor of the project.

Increases in employment downtown would also increase demand for business services, to the extent that the expanded space would not be occupied by firms providing those services. In response, demand would increase for existing space and possibly for further new development.

The proposed provision of about 40 condominium apartments in the project could generate a demand for some resident-serving retail services. To the extent that they are not located within the project, new facilities could be induced to locate nearby. The placement of residential units in this location could tend to encourage other new developments in the Financial District to include housing.

An amendment to the City Planning Code to allow the amount of on-site housing proposed by the project would have an impact on subsequent development in the C-3 District (see Section IV, Land Use, p.46). Such a modification of the Code would encourage the provision of additional on-site housing in future high-rise developments. Larger buildings than are presently permitted would be possible on sites of less than 1/2 an acre; such small sites do not presently qualify as Planned Unit Developments under Section 304 of the Code. It is likely that such an amendment to the Planning Code would result in buildings which exceed the maximum FAR and height recommendations contained in the Department of City Planning document Guiding Downtown Development. It is not possible to determine the exact location, size, or number of buildings which might be proposed as a result of such a change in the Planning Code.

Modification of the Planning Code to allow approval of the project would generally encourage more housing units in the C-3 District. An increase in housing would result in greater development of residential retail facilities and domestic conveniences, as well as greater 24-hour activity, in the Downtown.

V. MITIGATION MEASURES PROPOSED TO MINIMIZE THE POTENTIAL IMPACTS OF  
THE PROJECT

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In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the proposed project. Some of these measures have been or would be adopted by the project sponsors or their architects and contractors, some are under consideration by the project sponsors and others have been rejected by the sponsors.

Each mitigation measure and its status are discussed below. Where a measure has been rejected, the reasons for its rejection are discussed.

A. LAND USE AND ZONING

MEASURE PROPOSED AS PART OF THE PROJECT

- 1. This Mitigation Measure has been revised in Responses to Comments and has been inserted as Mitigation Measure No. 26A, p. 117.

B. URBAN DESIGN

MEASURES PROPOSED AS PART OF THE PROJECT

- 2. The project's sculptured upper-level facade is intended by the architect to (1) reduce the apparent scale and bulk of the building; (2) provide visual interest to viewers from Telegraph Hill, Columbus Ave. and the Jackson Square District; and (3) serve as an apparent transition in height from the taller high-rise buildings of the C-3-0 district which frame the project to the low-rise structures of the Jackson Square District, north and northeast of the site.

## V. Mitigation

3. The project would include pedestrian amenities; pedestrian-scale retail activity; and sidewalk space designed to improve pedestrian access to work, shopping and passive recreation spaces and transit facilities, and to contribute to a visually interesting streetscape. Proposed pedestrian amenities include street trees and sidewalk plantings, multiple building entrances, widened sidewalks and ground-floor commercial activity. Ground-floor commercial activity would include uses such as a restaurant, apparel store, stationery store and/or travel agency. Retail space would not include any financial institutions although an automatic banking terminal may be provided.
4. The project would include street trees and sidewalk plantings on Montgomery and Washington Sts. Entry plazas, the residential lobby, and the pool area would be landscaped. Street-side glass walls, vegetation, or other screening would be used to provide pedestrian protection in the covered walkway area and to modify the project's wind effects on pedestrians.
5. The project sponsor would use a decorative paving material on the Merchant St. sidewalk fronting the site to enhance pedestrian interest, and would consider installing decorative paving on Merchant St., after consultation with other property owners and the Department of Public Works
6. The project would provide open space on the upper levels of the building for use by residents, in an amount greater than that required by Section 135 of the Planning Code.
7. The project sponsor would install a windscreen at the swimming pool area (either a roof above the area, a landscaping screen, or walls surrounding the area) to decrease wind turbulence.

C. EMPLOYMENT, HOUSING, AND FISCAL FACTORS

MEASURES PROPOSED AS PART OF THE PROJECT

8. The project sponsor would financially assist the existing restaurant and parking lot tenants in relocation activities. The two professional tenants have leases which expire in December 1981, and will not receive relocation assistance from the project sponsor.
9. The project would contain a total of about 90 bedrooms in about 40 residential condominiums. These units would vary from 1,200 to 2,400 sq.ft., providing a range in size. Project housing would help mitigate increased demands on the City's housing supply, which may be generated by the project's office development, although the project would not satisfy the generated residential demand in full.
- 9A. The project sponsor could require the general contractor and subcontractors to implement affirmative action goals consistent with those established by the City's Human Rights Commission. Contractors needing assistance in meeting these goals may contact the Recruitment and Training Program (under the Comprehensive Employment and Training Act) and the San Francisco Building Trades Council. The Recruitment and Training Program can provide hiring lists of qualified women and minorities to contractors having difficulty meeting affirmative action goals.

MEASURE WHICH COULD BE REQUIRED BY THE CITY PLANNING COMMISSION

10. According to the formula set down in the Memorandum, "Housing Requirement for Office Development in San Francisco" (Dean Macris, Director Department of City Planning, July 1, 1981), the project would generate a demand for 210 residential units in San Francisco. Forty, large units are proposed as part of the project. The City Planning Commission could require the project sponsor to satisfy the remainder of the demand by development of units off-site, or by other means such as contributions to a non-profit housing development corporation.

## V. Mitigation

- 10A. The project sponsor could build low-rise housing in Chinatown to respond to the housing demand in San Francisco generated by the project. This mitigation measure has been rejected by the project sponsor for several reasons. The Chinatown area is intensively built-up and few single sites exist, large enough to accommodate the total housing demand generated by the project in one low-rise structure. (Eva Levine, Department of City Planning, telephone communication, January 6, 1982.) To accommodate the project housing demand in low-rise buildings in the site vicinity, it would be necessary for the sponsor to obtain several smaller sites. Even if sufficient sites were available, it might not be cost-effective for the sponsor to develop low-rise housing compared to condominiums atop an office structure. (Low-rise housing would have a higher land cost in proportion to total cost than would high rise condominiums.) The provision of housing exclusively off-site would not respond to "Objective 2 of Policy 2 of the Residence Element of the Comprehensive Plan which recommends 'multiple-residential development in conjunction with commercial uses in the Downtown commercial area.'" (see p. 49, paragraph two).

### D. TRANSPORTATION, CIRCULATION AND PARKING

#### MEASURES PROPOSED AS PART OF THE PROJECT

11. The project sponsor would participate proportionately in whatever legal means is finally adopted by the Board of Supervisors to contribute funds for an established Downtown transit assessment district to meet the peak demands caused by cumulative office development in the Downtown area.

12. A transportation broker would be located in the project management office to encourage transit use through the sale on-site of BART and Muni passes to employees, and to encourage employee car pool and van pool systems in cooperation with RIDES for Bay Area Commuters by providing a central clearinghouse for car pool and van pool information.
13. The project sponsor would provide secure bicycle parking facilities to encourage the use of bicycles by employees and messengers. Handicapped parking and handicapped access facilities would be provided in the proposed parking garage.
14. During the construction period, construction truck movement would be limited to the hours between 9:00 a.m. and 4:00 p.m. to minimize peak-hour traffic conflicts. The project sponsor and construction contractor would meet with the Traffic Engineering Division of the Bureau of Engineering to determine feasible traffic mitigation measures to reduce traffic congestion during construction.
15. Project contractors would place paving, landscaping and structures in the sidewalk area (subject to review and approval of the Department of Public Works) so as to minimize interference with pedestrian traffic.
16. Building directories and visual aids indicating the location of the freight elevators would be placed in the loading area of the building. This measure would be consistent with off-street loading recommendations contained in the Department of City Planning document Guiding Downtown Development.
17. The project would include about 40 parking spaces for the residential portion of the building, or 30 spaces more than the residential parking requirement of one space for each four dwelling units in the C-3-0 District, as defined by Section 151 of the City Planning Code. The remaining parking spaces would be designated as short-term spaces, in compliance with Objective 1, Policy 4 of the Downtown Transportation Plan, which discourages long-term parking in the Downtown.

18. Preferential parking would be provided for car pools, van pools, handicapped and short-term parkers, and residential tenants in relation to demand generated by the project. Actual allocations of reserved spaces among these users have not been determined; they would be determined by the transportation broker and project sponsor after occupancy of the building as demand becomes known.
19. A garage attendant would be employed to insure proper use of the loading area and garage and prevent delivery vehicles from blocking access to the parking ramp or parking spaces on the mezzanine level. The garage attendant would be employed for a minimum of 12 hours per day; if desired by the condominium homeowners association, the garage would be attended on a 24-hour basis.
20. The building would have "eyebolt" fixtures suitable for suspending MUNI trolley wires on the Montgomery and Washington St. frontages, in accordance with recommendations of the MUNI planning department.
21. Upon project completion the project sponsor would encourage tenant firms to implement a flexible time ("flex-time") system for employee working hours (flex-time is designed to reduce peaks of congestion in the transportation system).
22. Within a year of full occupancy of the project, the project sponsor would conduct a survey, in accordance with methodology approved by the Department of City Planning, to assess actual trip generation patterns of project occupants and actual pick-up and drop-off areas for car pools and van pools. The project sponsor would make this survey available to the Department. Alternatively, at the request of the Department, the sponsor would provide a fair and equitable in-lieu contribution toward an overall transportation survey for the downtown area to be conducted by the City.
23. To minimize cumulative traffic impacts due to lane closures and street excavation during construction, the project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction, or later become known.

24. The project sponsor would require, by contract, that the general contractor provide off-street parking for construction workers on the project site or at an off-site location, to minimize demand for on-street parking by construction workers.

#### MEASURES THAT COULD BE IMPLEMENTED BY PUBLIC AGENCIES

25. The overload that would occur in Muni, BART, A-C Transit and the SamTrans mainline route (highway 101) due to cumulative development in the Downtown area could be mitigated by provision of additional buses, by headway changes, and possibly by shifts in routes. Implementation of this mitigation measure by the applicable transit carriers would depend primarily on the availability of funds and on actions initiated by MTC and the respective transit agencies and districts.
26. Pacific Gas and Electric Company could coordinate work schedules with other utilities requiring trenching, so that street disruption would take place during weekends and off-peak hours. This would be done through the San Francisco Committee for Utility Liason on Construction and Other Projects (CULCOP)
- 26A. The City, by action of the Board Supervisors, could require that the portion of the proceeds from the sale of Lot 25, which represents the difference between the actual acquisition costs for the property and the sale price, be used to purchase land for open space in Chinatown.

#### MEASURES REJECTED

27. The provision of loading facilities to accommodate semi-trailers has been rejected by the project sponsor due to the configuration of the proposed parking facility and to lack of space.
28. The provision of four off-street loading space, two more than required by Code, has been rejected by the project sponsor due to the configuration of the proposed parking facility and to lack of space.

E. AIR QUALITY

MEASURES PROPOSED AS PART OF THE PROJECT

29. During excavation, the general contractor would sprinkle unpaved demolition and construction areas with water at least twice a day to hold down dust. This would reduce particulate emissions (dust) by about 50%.
30. The general contractor would maintain and operate construction equipment in such a way as to minimize exhaust emissions. During construction, trucks in loading or unloading queues would be kept with their engines off when not in use, to reduce vehicle emissions.

F. NOISE

MEASURES PROPOSED AS PART OF THE PROJECT

31. The project contractor would comply with all requirements of the San Francisco Noise Ordinance, including limiting noise emissions from powered construction equipment at 80 dBA at a distance of 100 ft. The project contractor would muffle and shield intakes and exhausts, shroud or shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible. There would be no pile driving.
32. Prior to construction, the project sponsor would meet with the Holiday Inn management to negotiate and implement feasible noise abatement measures to reduce noise impacts on hotel rooms. Additional noise control measures, such as limitation on the hours of construction activity, would be arranged, if necessary and as feasible, by the Department of Public Works at the request of the Holiday Inn and adjacent offices.
33. The project would comply with Title 25 of the California Administrative Code regarding noise insulation for residential uses.

34. The general contractor would construct barriers around the site, and around stationary equipment such as compressors, which would reduce construction noise by as much as 5 dBA. The general contractor would locate stationary equipment in pit areas or excavated areas as these areas would serve as noise barriers.

G. ENERGY

MEASURES PROPOSED AS PART OF THE PROJECT

35. Wherever possible, office suites would be equipped with individual light switches, time clock operation and fluorescent lights, to conserve electric energy. A centralized management computer system would monitor off-hour (evenings and weekends) heating and air-conditioning use and tenants would be charged for off-hour heating and air-conditioning service used, which would be a conservation incentive.
36. The heating, ventilating and air conditioning (HVAC) system would be equipped with an economizer cycle to use cooling tower water for cooling, when feasible. The HVAC system would be designed to recycle waste heat to heat the project swimming pool and residential units.
37. Residential units would have a master gas meter for all units. Individual electric service would encourage energy conservation.
38. Residential and office water heating systems would be insulated to minimize waste heat and water use. In residential units, if individual water heaters were to be provided, they would be placed as close as possible to the source of use (sinks, showers, dishwashers), to minimize wastewater and waste heat.
39. The project sponsor and project engineer have met with the Energy Conservation Department of the Public Utilities Commission to present measures proposed as part of the project that would be taken to assure energy conservation.

## V. Mitigation

40. The project would comply with energy conservation requirements of Title 24 of the California Administrative Code.
41. Project energy use would be monitored and/or controlled by an automated Energy Management System.
42. The project would provide containers, to be located on the parking level, available to tenants of the entire building for collection and storage of recyclable solid wastes (such as glass, metal, computer cards, and newspaper) and the building manager would contract for recycling service.

### MEASURES UNDER CONSIDERATION

43. The project sponsor could investigate the feasibility of passive or active solar features for residential units and common areas; such features could be incorporated into the project, if proven feasible.
44. The project sponsor could investigate the use of openable windows for the commercial portions in the building and install if feasible.

### MEASURES REJECTED

45. The project sponsor has considered solar heating of the proposed swimming pool. This measure was rejected because project engineers have determined that use of waste heat from the office portion of the building would be more economically feasible and efficient than solar energy for this use.
46. Double or triple paned windows were rejected because they would unnecessarily insulate the building, would, therefore, increase the cooling demand of the project, and would represent increased energy costs and consumption for fabrication of building materials.
47. Use of natural gas in the condominiums for cooking and heating was rejected because it would be infeasible to individually service the condominiums. Individual metering at ground level with separate service pipes to the condominium levels would require too much area to be

practical. Piping of natural gas to those heights, also has an associated safety hazard. Natural gas for the condominiums would be used only in the domestic central hot water heater.

#### H. CULTURAL

##### MEASURES PROPOSED AS PART OF THE PROJECT

48. Should evidence of cultural or historic artifacts of significance be found during project excavation, the Environmental Review Officer and the President of the Landmarks Preservation Advisory Board would be notified. The project sponsor would select an archaeologist to help the Office of Environmental Review determine the significance of the find and whether feasible measures, including appropriate security measures, should be implemented to preserve or recover such artifacts. The Environmental Review Officer would then recommend specific mitigation measures, if necessary, and recommendations would be sent to the State Office of Historic Preservation. Excavation or construction which might damage the discovered cultural resources would be suspended for a maximum of four weeks to permit inspection, recommendation and retrieval, if appropriate.
49. The project sponsor would install a plaque on the project site to commemorate the history of the Bolton & Barron Building, listed in the California Historic American Building Survey.

#### I. LAND (Topography, Soils, Geology)

##### MEASURES PROPOSED AS PART OF THE PROJECT

50. A detailed foundation and structural design study has been conducted for the building by a California-licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design and construction of the project.

## V. Mitigation

51. The project sponsor would post a surety bond, if required by the San Francisco Department of Public Works, before issuance of a permit to excavate. Such a bond would protect the City against damages to City-owned sidewalks, streets and utilities.
52. The project sponsor would require the project contractor and sub-contractor to obtain a Faithful Performance and Payment Bond, if proper financial capability is not evident, and to be responsible for any damage to existing buildings which might result from excavation. This bond would protect the project sponsor and owners of adjacent properties if any damage to these properties were to result from construction activities.
53. Excavation pit walls would be shored up and protected from slumping or lateral movement of soils into the pit. Shoring and sheeting with soldier beams could be used for this purpose. The contractor would comply with the Excavation Standards of the California Occupational Safety and Health Agency (Department of Industrial Relations).
54. Montgomery, Washington and Merchant Sts. would be mechanically swept by the demolition and excavation contractors, as required by the San Francisco Building Code, so that silt would not be washed into the storm drains and dust would be reduced. This would be a provision of excavation and demolition contracts.
55. Groundwater observation wells would be installed for monitoring the level of the water table and other instruments to monitor potential settlement and subsidence. The City would require a lateral and settlement survey to monitor any movement or settlement of surrounding buildings and adjacent streets during the dewatering. Control lines and benchmarks would be established for monitoring horizontal and vertical movement. Costs for the survey and any necessary repairs to services under the streets would be borne by the contractor.

56. If, in the judgment of City engineers, unacceptable subsidence occurs during the construction, groundwater recharge would be begun to halt the settlement. This might cause a delay in construction.
57. Groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Division of the Department of Public Works, to prevent sediment from entering the storm drain/sewer lines.

J. UTILITIES AND PUBLIC SERVICES

MEASURES PROPOSED AS PART OF THE PROJECT

58. To reduce the demand on police protection services, the project would incorporate internal security measures such as a 24-hour staffed guard station in the lobby area; closed circuit television cameras and internal security personnel; well-lighted entries; alarm systems; separate security elevator and locked entrances with telephones for the residential portion of the building; and computerized office and residential entrances accessible only by pre-programmed magnetic keys.,
59. The project would incorporate all emergency response systems stipulated by the Life Safety Code, including fire alarms, an emergency communication system, an emergency power supply and an on-site emergency water supply. These measures would reduce hazards to building occupants during an earthquake or fire.
60. The project would incorporate low-flow faucet and toilet fixtures to reduce water consumption and wastewater.
61. The building would be equipped with a trash compactor to reduce the volume of solid waste requiring storage and transport. Separate storage facilities for recyclable waste material would be provided for both office and residential uses.

● MEASURES UNDER CONSIDERATION

62. Prior to construction, the project sponsor would instruct the general contractor to install markers and to monitor street settlement to ensure protection of the water mains; this action would take place in coordination with the Department of Public Works.
63. Prior to construction, the general contractor would meet with PG&E officials to document the location of high-pressure natural gas lines. The general contractor would assume the responsibility of insuring that construction activities would be prohibited from the proximity of these pipes.

VI. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

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B. URBAN DESIGN

The project would shade streets and sidewalks in the project vicinity; no public parks, including Portsmouth Square and the Transamerica Redwood park, would be shaded. The project would add to the shadows cast by the existing 601 Montgomery, Holiday Inn, and Transamerica buildings, and would complete shading of portions of Montgomery St., Washington St. and Columbus Ave. by eliminating existing corridors of sunlight between combinations of existing structures. Portions of the widened sidewalk and seating area on the north side of the Transamerica Pyramid would be shaded in the late afternoon at all seasons of the year.

The project would increase northwesterly wind speed ratios from moderately low to moderate on Montgomery St., east of the site and at the Columbus Ave./ Montgomery St./Washington St. intersection. Westerly winds would be increased 15% on Washington St. north of the site with a vortex appearing midway between Kearny and Montgomery Sts.

C. EMPLOYMENT, HOUSING AND FISCAL FACTORS

The project would result in an increase in office space of about 233,300 gross sq. ft. and an increase of about 88,100 gross sq. ft. of residential floor space. The project would also result in the loss of 1,200 gross sq. ft. of reataurant space. The project would accommodate an increase in on-site employment of as many as 950 employees and would require displacement of 4 businesses and a parking lot (a total existing employment of 13 persons).

F. TRANSPORTATION, CIRCULATION AND PARKING

The project would generate a demand for about 290 daily parking spaces. The parking demand generated by the building, plus the net loss of commercial parking caused by the project would result in an on-site deficit for the project of about 310 spaces.

The project would contribute to cumulative impacts on Muni and other transit agencies; the project would increase transit ridership and transit loading by up to 0.3% on non-Muni systems and about 1% during the peak-hour on Muni systems.

G. AIR QUALITY

Project-related emissions would have no measurable impact on local or regional concentrations and would not increase the frequencies of standards violations, but would contribute to impacts from cumulative Downtown development.

H. ENERGY

Projected total energy use by the project would be 175,000 Btu at-source per sq. ft. per year. The project would have an associated consumption of about 200,000 gallons of gasoline for project-generated vehicular traffic. Total project energy consumption would be equivalent to about 15,000 barrels of oil per year.

I. CONSTRUCTION NOISE

During excavation and exterior finishing noise levels in the 601 Montgomery building could reach as high as 65 dBA interfering with human speech and concentration, distracting employees and requiring raised voices to communicate. Interior noise levels in Holiday Inn guest rooms nearest the project site would reach about 65 dBA during periods of excavation and exterior finishing (about 10 months); noise at this level would interfere with speech and sleep.

VII. ALTERNATIVES TO THE PROPOSED PROJECT

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The project sponsor, has considered, and is considering, a number of alternatives to the proposed project.

A. ALTERNATIVE ONE: CODE-CONFORMING ALTERNATIVE

This alternative would result in development of a combined office and condominium residential building on the project site. The alternative design would conform to the City Planning Code and Interim Controls and its approval by the City Planning Commission would not require a modification of the Code. Alternative One would be similar to the proposed project in height, bulk and design. The lobby, parking and office floors would be identical to the project as proposed. This alternative would include about 35 condominiums, five fewer than the proposed project. Residential units would be eliminated in the southwest corner of the building at the upper three stories to reduce the residential floor area to an amount consistent with identified bonus space.

This alternative would be about 300 ft. in height and contain a total of 24 stories. Alternative One would comply with the bulk and use provisions of the City Planning Code. The ground floor would contain retail use and separate lobbies for the residential and office portions of the building. A parking facility, accommodating about 60 vehicles, would be located on the second level plus mezzanine. Two freight loading spaces would be accessible via ramps from Merchant St. The building would contain 15 floors of office space and six floors of residential space. As in the proposed project, gross floor area of the commercial portion of the building would be approximately 243,600 sq. ft., representing an FAR of about 14:1.

Applicable bonuses, allowed under Section 126 of the City Planning Code, would be used for residential space as provided for under the Interim Controls. The project sponsor would request bonuses for multiple building entrances, sidewalk widening, shortened walking distances, a rooftop observation deck and

## VII. Alternatives to the Proposed Project

parking access (see Table 1, p. 26). These bonuses would permit about 83,700 gross sq. ft. of additional floor area. About 83,300 gross sq. ft. of residential space would be provided under this alternative, representing an FAR of about 4.8:1. The gross floor area of the entire building would then be about 326,900 sq. ft., for an FAR of about 18.8:1, compared to 19.1:1 for the proposed project. This alternative would contain about 4,800 sq. ft. less residential floor area, and five fewer condominium units, than would the project.

The impacts of this alternative would generally be as described in the Environmental Impacts section of this report (see Section IV, pp. 46-111) for the proposed project. Alternative One would conform to the floor area and development bonus provisions of the City Planning Code and Interim Controls; the potential land use and growth-inducing impacts which would be expected to accompany modification of the City Planning Code under the proposed project would not occur. The cumulative impact of larger buildings which might be developed in the C-3 District due to a Code amendment which would allow the project's proposed residential area would not occur. Visually, Alternative One would be identical to the proposed project except that there would be less residential space in the southeast corner of the upper three stories; shadow patterns, wind effects and urban design impacts of this alternative would be as described for the project. By providing five fewer residential units than the project this alternative would satisfy less of the housing demand generated by the office portion of the building.

As with the proposed project, this alternative would result in demolition of the existing structures on the site and removal of the surface parking lot. Construction traffic, air quality and noise impacts would generally be similar to the proposed project. Energy consumption for the office portion of the building would be the same as with the project; the residential energy consumption would be about 10% less. Operational traffic impacts would be similar to the proposed project as the same number of on-site parking spaces are proposed.

Alternative One is under consideration by the project sponsor.

### B. ALTERNATIVE TWO: NO PROJECT ALTERNATIVE

This alternative, would entail no change to the site. The building at 643 Montgomery St., rated "C" in the study conducted for the Foundation for San Francisco's Architectural Heritage, and the second building on the site would be retained under this alternative. Because existing buildings on the site do not meet current seismic and safety standards, they could continue to pose life safety hazards to employees and other occupants under certain conditions, such as an earthquake.

In general, the environmental characteristics of this alternative would be substantially as described in the Environmental Setting section of this report (see Section III, pp. 30 - 45, for a discussion of existing conditions). Traffic, transit and air quality conditions (described in Section IV of this report) as 1984 base conditions with cumulative development, but without the project, would exist on streets around the site in 1984. The noise environment of the area would not change except for noise generated by increased cumulative traffic in the vicinity. There would be no change in the demand from the site for community services. The five businesses now operating on the site would not have to relocate.

This alternative would preserve options for future development of the site. It is not acceptable to the project sponsor because it would not provide additional office space and residential units to partially meet existing demand in San Francisco and because it would be an economic underuse of the site.

This alternative could result in the development of a high-rise building comparable to the project at another location. Development elsewhere in San Francisco would generally result in specific impacts as described for the project. Development at a location outside of San Francisco would probably involve an office building without on-site housing. The impacts of such a project would largely depend upon the location chosen and cannot now be accurately determined. Development of the project at a different location has

## VII. Alternatives to the Proposed Project

been rejected by the project sponsor because of the firm's association with the City of San Francisco, existing interests in the site and the sponsor's conviction that the project site is a prime location for housing in the City.

### C. ALTERNATIVE THREE: 14:1 COMMERCIAL SPACE ALTERNATIVE

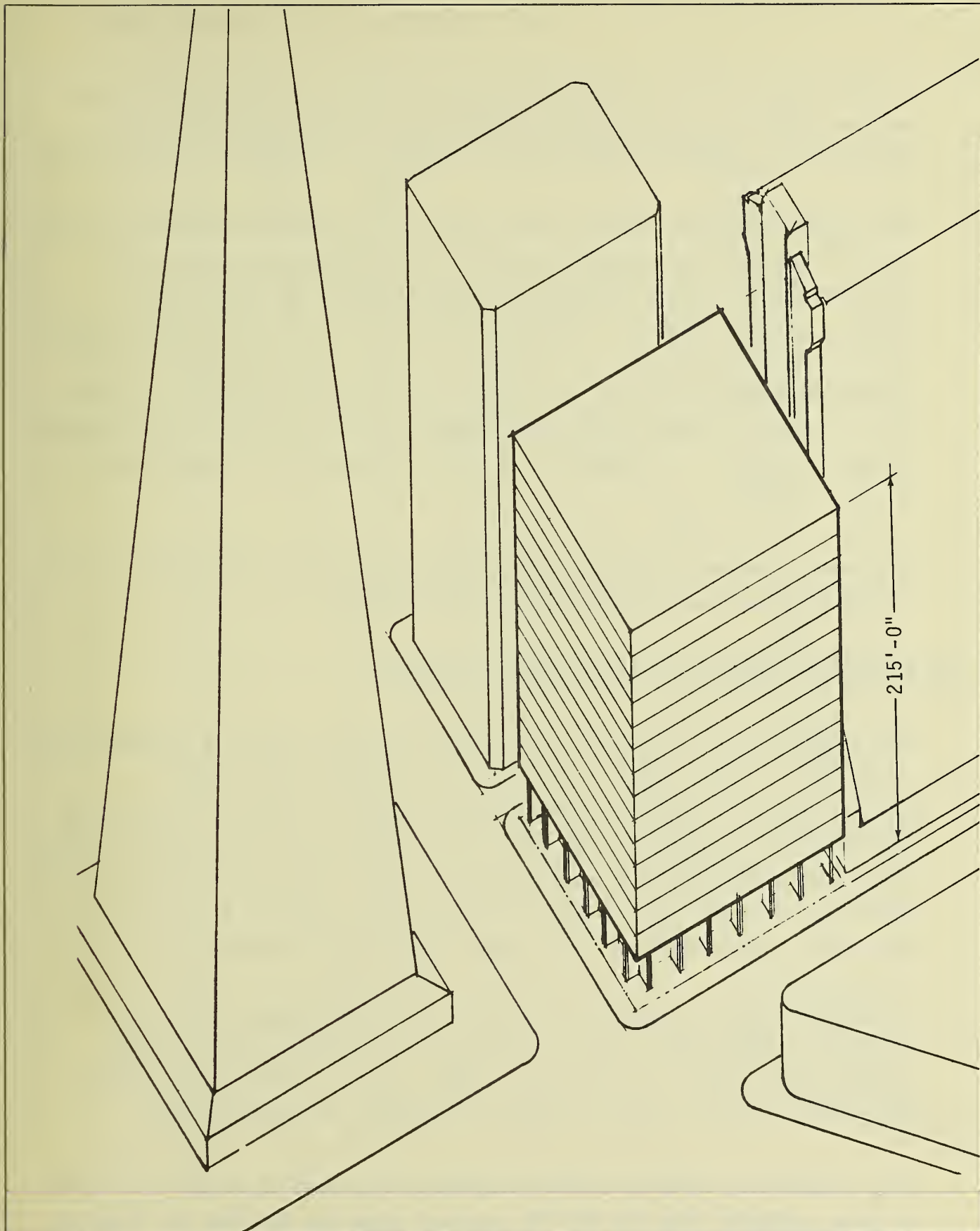
This alternative would consist of an office building, about 215 ft. in height, developed on the four parcels which comprise the proposed project site (see Figure 29). This alternative would contain approximately 243,600 gross sq. ft. of commercial space, representing an FAR of about 14:1, including ground-floor retail and lobby space and 14 floors of office space. There would be no residential development on the site.

A one-level parking garage would be provided, accommodating about 40 vehicles. The gross floor area of the parking garage would be about 17,000 sq. ft., about 7% of the gross floor area of the building. Loading space for two service vehicles would be accessible via Merchant St.

Under Alternative Three, the building would be generally rectangular in shape. There would be no upper level setbacks, as proposed for the project. The building would be about 85 ft. shorter than the maximum permitted height of 300 ft., and about 85 ft. shorter than the proposed project.

Land use effects would be similar to those of the proposed project except that Alternative Three would not satisfy any of the housing demand which would be generated by on-site office space. This alternative would not result in 24-hour activity on the site or in demand for resident-oriented retail services in the Financial District through the provision of residential space.

Urban design effects of this alternative would differ from the proposed project because of the decreased building height and absence of upper level setbacks; however, the building tower would be more visible than existing structures on the site. Pedestrian-level views from near the site would be similar to those of the project as proposed. The effect of this alternative



SOURCE: Kaplan/McLaughlin/Díaz

FIGURE 29: Alternative Three -  
Commercial Space Alternative

## VII. Alternatives to the Proposed Project

on long-range views of existing buildings in the site vicinity from the north and west, would be less than the proposed project because of the smaller building size. Shadow effects would be lessened in comparison to the project.

This alternative would result in demolition of the existing structures on the site and removal of the surface parking lot. Construction traffic, air quality and noise impacts would generally be similar to the proposed project. Energy consumption impacts would be similar to the proposed project for the office portion of the building. In total, this alternative would consume about 10% less energy than the project because residential use would not be included. Operational traffic impacts would be similar to the proposed project, but with no residential use there would be less off-peak travel in the site vicinity.

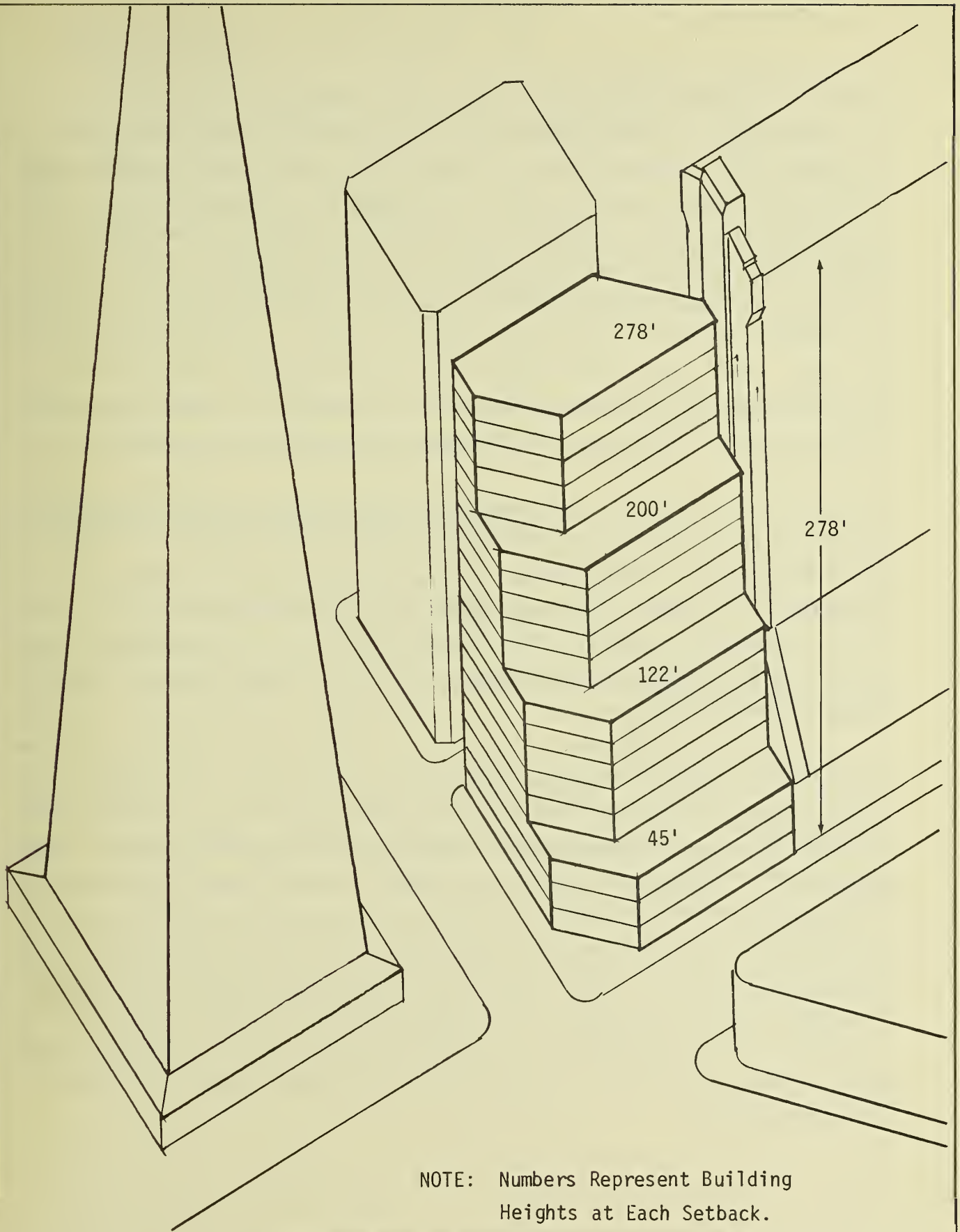
The project sponsor has rejected this alternative as not contributing housing to partially meet existing demand in San Francisco.

### ● ALTERNATIVE THREE A: STEPPED HEIGHT ALTERNATIVE

This alternative would consist of an office building reaching a maximum height of 278 ft. (see Figure 29A). The building would step down toward Washington St. in a series of three setbacks from the height of the adjacent 280-foot-tall 601 Montgomery St. building. Alternative Three A would contain approximately 243,600 sq. ft. of commercial space, representing an FAR of about 14:1, including ground-floor retail and lobby space and 16 floors of office use. There would be no residential development on the site.

A one-level parking garage would be provided, accommodating about 40 vehicles. The gross floor area of the parking garage would be about 17,000 sq. ft., about 7% of the gross floor area of the building. Loading space for two service vehicles would be accessible via Merchant St.

Under Alternative Three A, the building would step down in height in a series of three setbacks, from 278 ft. (18 stories) along the Merchant St. frontage, to about 45 ft. (3 stories) along the Washington St. frontage. The structure



NOTE: Numbers Represent Building  
Heights at Each Setback.

SOURCE: Kaplan/McLaughlin/Diaz

● FIGURE 29A: Alternative Three A-  
Stepped Height Alternative

## VII. Alternatives to the Proposed Project

would have diagonal setbacks from the corner of Montgomery and Washington Sts., and from Merchant St. at the southwest border of the site. The ground-floor, parking level, and first office floor would be similar to those of the proposed project, but would include the diagonal setbacks. The next 5 floors, reaching a height of about 122 ft., would be setback from Washington St. approximately one-quarter of the site dimension. The next 5 floors, reaching a height of 200 ft. would be set back an additional 25% and the remaining 5 floors, reaching the height of 278 ft., would be again set back 25%. These top 5 floors would occupy the one-quarter of the site area along Merchant St. This alternative would be about 22 ft. shorter than the maximum permitted, and about 22 ft. shorter than the proposed project.

Land use effects would be similar to those of the proposed project except that Alternative Three A would not satisfy any of the housing demand which would be generated by on-site office space. This alternative would not result in 24-hour activity on the site or in demand for resident-oriented retail services in the Financial District through the provision of residential space. Alternative Three A would comply with the bulk and use provisions of The City Planning Code.

Urban design effects of this alternative would differ from the proposed project because of the decreased building height and series of setbacks from the Washington St. frontage; however, the building tower would be more visible than existing structures on the site. Pedestrian-level views from near the site would be similar to those of the project except that the bulk along Washington St. would be reduced. The effect of this alternative on views of existing buildings east of the site from the Portsmouth Square area would be less than for the proposed project. Shadow effects would be lessened in comparison to the project but, as with the project, portions of Jackson Square would be shaded under this alternative during afternoon hours in the winter, spring and autumn.

## VII. Alternatives to the Proposed Project

This alternative would result in demolition of the existing structures on the site and removal of the surface parking lot. Construction traffic, air quality and noise impacts would generally be similar to the proposed project. Energy consumption impacts would be similar to the proposed project for the office portion of the building. In total, this alternative would consume about 10% less energy than the project because residential use would not be included. Operational traffic impacts would be similar to the proposed project, but with no residential use there would be less off-peak travel in the site vicinity.

The project sponsor has rejected this alternative as not contributing housing to partially meet existing demand in San Francisco.

### D. ALTERNATIVE FOUR: REDUCED SITE ALTERNATIVE

● This alternative would develop the three of the four parcels owned by the project sponsor. Lot 25, formerly in City ownership, would remain vacant. Under this alternative, the site would be about 12,600 sq. ft. This alternative would develop a combined office and condominium residential building. Approximately 176,000 gross sq. ft. of office and commercial space would be provided, about 67,000 sq. ft. less than the proposed project, representing an FAR of about 14:1. Applicable bonuses, allowed under Section 126 of the City Planning Code, would be used for the provision of residential space. Allowable bonuses, for multiple building entrances, sidewalk widening, and shortened walking distances, would permit about 45,000 gross sq. ft. of additional residential space. Assuming an average unit size of about 1,200 sq. ft., about 38 residential units could be provided under this alternative, about two fewer than with the proposed project. These residential units would generally be smaller than those proposed for the project. The gross floor

## VII. Alternatives to the Proposed Project

area of the building would then be about 219,000 sq. ft., about 66% of the proposed project, for an FAR of about 17.4:1, compared to 19.1:1 for the proposed project.

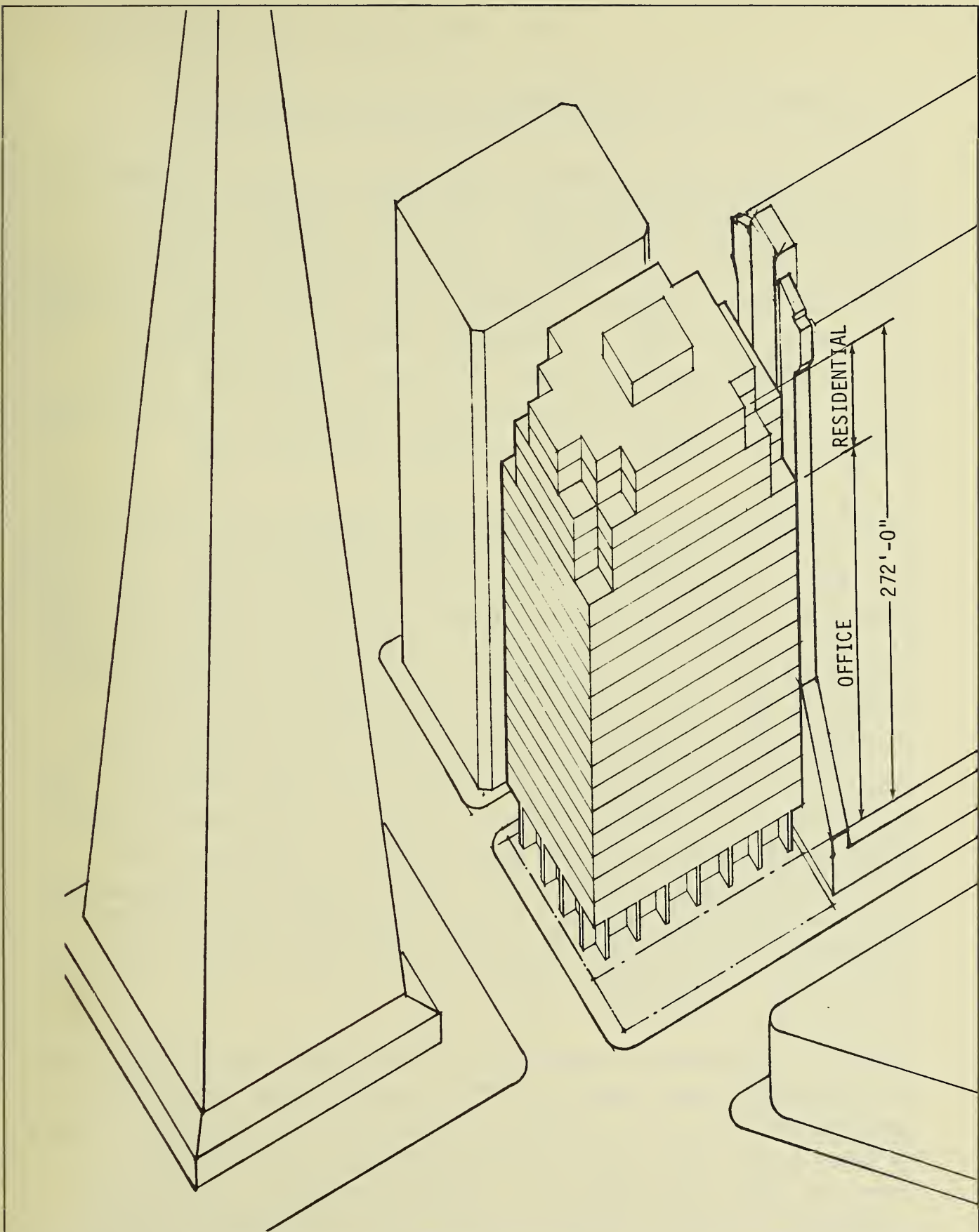
This alternative would be about 272 ft. in height (see Figure 30). The ground floor would contain retail use and separate lobbies for the residential and office portions of the building. A one-level parking facility would be provided. Parking ramps and loading spaces for service vehicles would be accessible via Merchant St. There would be 14 floors of office space and five floors of residential condominiums.

This alternative would comply with the general objectives of the San Francisco Comprehensive Plan and with the bulk and use provisions of the City Planning Code. The building height would be about 25 ft. below the maximum permitted and about 25 ft. less than the proposed project.

The office portion of the building would generally be rectangular in shape with sculptured setbacks at the residential levels. This alternative would result in an open-ended project block as Lot 25 would remain vacant unless subsequently developed. The building tower would be more visible than the existing structures on the site. The effect of this alternative on views of existing buildings in the site vicinity, from long-range viewpoints to the north and west, would be less than the proposed project because of the smaller building size. Shadow effects on the surrounding area would be reduced in comparison to the proposed project.

This alternative would result in demolition of the existing structures on the site and removal of the surface parking lot. Construction traffic, air quality and noise impacts would generally be similar to the proposed project. Energy consumption impacts would be similar to the proposed project for the residential portion of the building; the office portion of the building would consume about 25% less energy than the project. Operational traffic impacts would be reduced from those of the proposed project about 25%, roughly in proportion to the reduced floor area and number of parking spaces.

Alternative Four is under consideration by the project sponsor.



SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 30: Alternative Four -  
Reduced Site Alternative

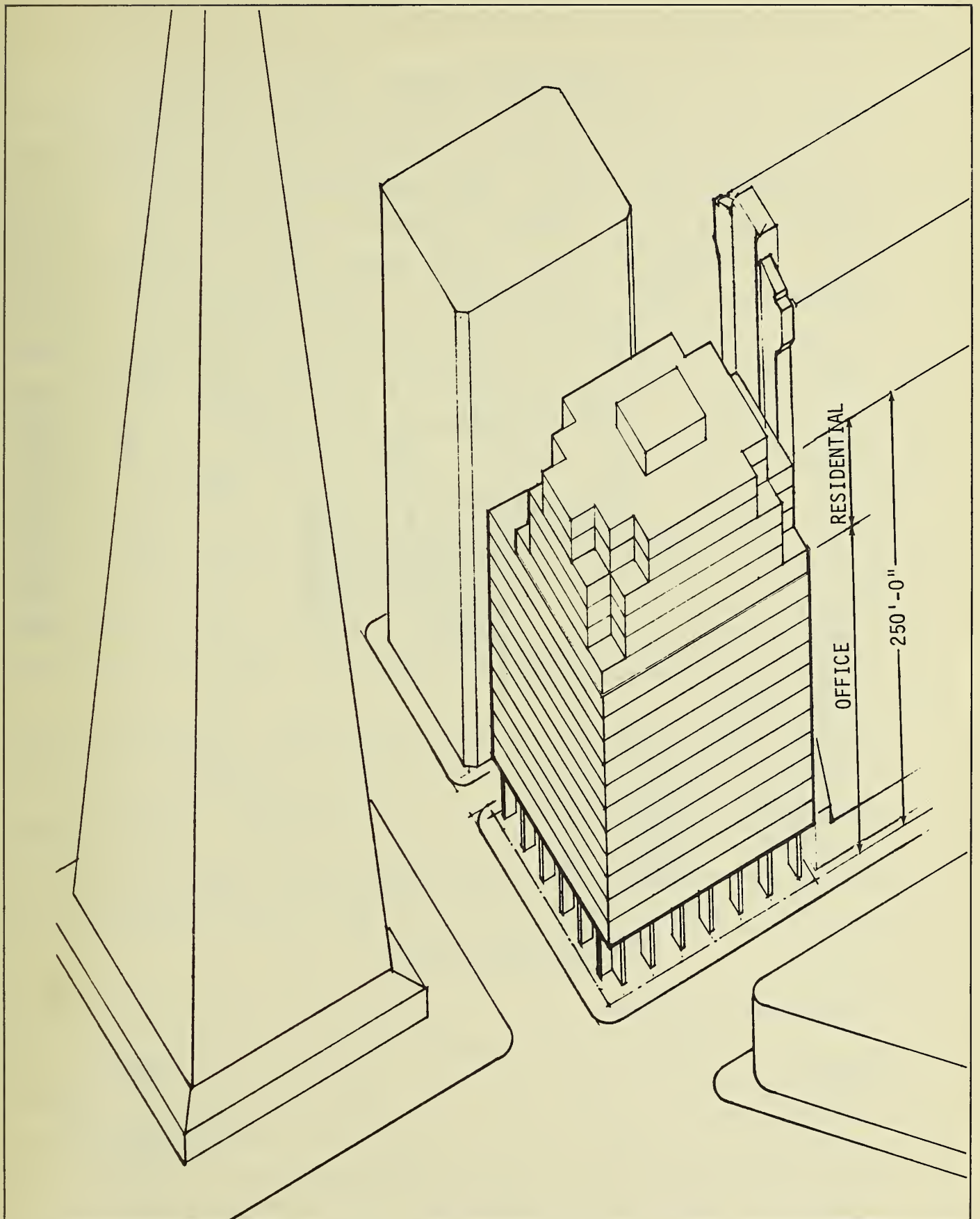
## VII. Alternatives to the Proposed Project

### D. ALTERNATIVE FIVE: GUIDING DOWNTOWN DEVELOPMENT ALTERNATIVE

This alternative would be designed to comply with the guidelines contained in Guiding Downtown Development (GDD), published by the Department of City Planning in May 1981. GDD contains a series of regulatory proposals for managing development in downtown San Francisco affecting size, design, use and location of major buildings. The report proposes changes in the City Planning Code regulations for the C-3 Planning Code Use Districts pertaining to housing, transportation, open-space, and historic preservation. Table 15, p. 138, compares existing development controls contained in the City Planning Code to proposed changes in those requirements contained in GDD.

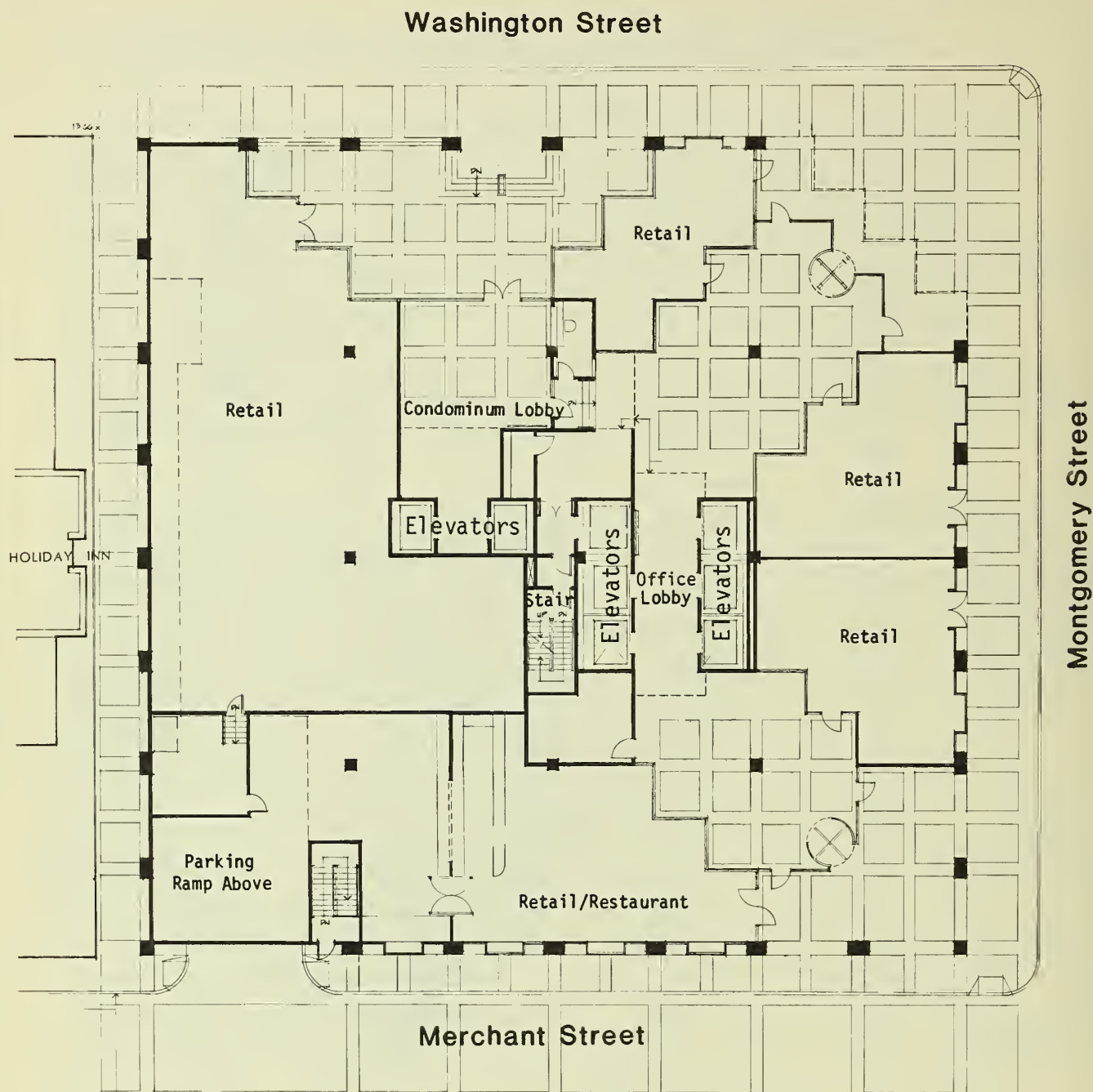
This alternative would develop all four parcels comprising the project site. The 250-ft. high structure would contain about 208,800 gross sq. ft. of office and commercial space, about 34,800 sq. ft. less than the proposed project, and representing an FAR of about 12:1. Residential use would occupy about 35,000 gross sq. ft. for an additional FAR of 2:1. Assuming an average unit size of about 1,200 gross sq. ft. (approximately the same size as the smallest unit proposed as part of the project), about 29 residential units could be provided, or about eleven fewer than the number of units proposed with the project; the average unit size would be smaller under this alternative. The overall FAR of this structure would be about 14:1. The maximum FAR allowed under the provisions contained in GDD would be 17:1, including 5:1 for housing, but the height limit of 250 ft. would not permit the development of the maximum FAR of the site. The building, containing a total of about 243,800 gross sq. ft., about 87,900 sq. ft. less than the project, would be about 250 ft. in height (see Figure 31).

Under this alternative the ground-floor plan would be different than for the proposed project (see Figure 32, p. 136). The ground-floor would contain about 10,000 gross sq. ft. of lobby and retail space, about 3,000 sq. ft. more than the project; there would be five ground-level retail uses, each containing fewer than 2,000 sq. ft. The second floor would contain eight parking spaces for the residents, as well as two freight loading docks and mechanical equipment. There would then be 13 floors of office space and three floors of residential condominiums, a total of 18 stories.



SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 31: Alternative Five –  
Guiding Downtown Development Alternative



SOURCE: Kaplan/McLaughlin/Diaz

FIGURE 32: Alternate Ground Floor Plan

## VII. Alternatives to the Proposed Project

The site is located in the 250-S Height District proposed in GDD, requiring that the average floor area above 65 ft. not exceed 20,000 sq. ft., and that the average sq. ft. of floor area above the midpoint of the height of the building be 2/15ths less than the average sq. ft. of floor area below the midpoint. This alternative would comply with the provisions for transfer of bulk from the upper to lower stories of the structure by sculptured upper-level setbacks similar to the proposed project. This alternative would provide the maximum amount of commercial space permitted in GDD and would equal the maximum height of 250 ft. in this proposed Height District. To comply with the GDD height and transfer of bulk provisions, the amount of housing would be reduced from the maximum allowable FAR of 5:1. No increase in height for residential uses would be permitted by GDD in 250-ft. height districts. If a height bonus of 50 ft. were provided to facilitate development of housing, as permitted in GDD for other proposed height districts, this alternative could contain about 40 more 1,200-sq. ft. units. A 50 ft. bonus would increase the height on the site to 300 ft., the existing height limit for the site. Such an alternative would appear similar to the project, but would have a reduced amount of commercial space.

This alternative would incorporate art work into the public entrance areas of the building. The proposed art requirement in GDD specifies that investment in art be equal to at least 1% of total construction costs. The proposed open space requirement of about 9,800 sq. ft. could not be met on-site, due to the provision of retail areas on the ground floor and open space for the residents at the upper-level setbacks. The required open space would have to be provided off-site at another location in a C-3-0 district.

The GDD guidelines specify that housing be provided at the rate of 640 sq. ft. of housing per 1000 sq. ft. of office space. Using this formula, approximately 124,000 gross sq. ft. of residential space would be required; this would represent a FAR of about 7.1:1. This amount of residential space could not be accommodated on the site under the FAR limitations recommended in GDD. If 35,000 sq. ft. of housing were provided on-site, an additional 89,000 sq. ft. of housing would have to be constructed off-site to meet the proposed housing requirement.

TABLE 15: COMPARISON OF EXISTING DEVELOPMENT CONTROLS TO PROPOSED CHANGES CONTAINED IN GUIDING DOWNTOWN DEVELOPMENT, MAY 1981

Major Development Controls Pertaining to Project Site	Present Requirements- City Planning Code and Interim Controls	Proposed Requirements- Guiding Downtown Development	Proposed Project
BASE FAR	14:1	12:1*	14:1 commercial plus 5:1 residential
Height Limit	300 ft.	250 ft.	300 ft.
Average Area per Floor	28,788 sq. ft.	20,000 sq. ft. above 65 ft.	16,000 sq. ft. above 65 ft. (office floors)
Maximum Diagonal Length	200 ft. above 150 ft. in height	200 ft. at top portion of building	180 ft. above 150 ft. in height
Size of Upper Floors	Not specified	Average floor area of floors above midpoint of building height to be 2/15 (13%) less than average floor area of floors below midpoint.	Average floor area of residential floors 26% less than average floor area of office
Incorporation of Art	Not required	Art equal to 1% of total construction cost.	Art proposed for ground floor; cost not determined
Ground-floor retail	Not required	2,000 maximum sq. ft. per use to obtain floor area bonus	4,000 sq. ft. proposed to accommodate about four tenants
Recreation/Open space	Not required	1 sq. ft. for public use per 25 sq. ft. of gross floor area (about 7,000 sq. ft. at an FAR of 12:1).	17,500 sq. ft. of common and private open space for use by project residents
Off-street loading	2 spaces for buildings containing between 200,001 and 500,000 sq. ft. of floor area	0.1 spaces per 10,000 sq. ft. of gross floor area for buildings containing more than 100,000 ft. (two spaces for the site).	2 spaces provided, as required by the City Planning Code
Long-term Parking	Not specified	None permitted for office uses	Long-term parking only for residential use
Provision of a Transportation Broker	None required	Proposed Requirement	Transportation broker would be provided
Provision of Housing	None required	640 sq.ft. per 1,000 sq. ft. of office space (about 188 units for the site); Maximum FAR equal to 5:1 on-site	40 on-site condominiums proposed for an FAR of 5:1

\* Additional FAR allowable for provision of housing (5:1); retention of or transferring development rights from significant architectural buildings (3:1); and for the provision of retail uses containing 2,000 sq. ft. or less per use (0.5:1). The maximum FAR, including allowable bonuses, is 17:1.

SOURCE: City Planning Code; and Guiding Downtown Development, May 1981.

## VII. Alternatives to the Proposed Project

This alternative would comply with the general objectives of the San Francisco Comprehensive Plan and with the use provisions of the City Planning Code. The building tower would be more visible than the existing structures on the site. The effect of this alternative on views of existing buildings in the site vicinity, from long-range viewpoints to the north and west, would be less than the proposed project because of the reduced height. Shadow effects would also be reduced under this alternative, due to the decreased building height.

In comparison to the project, winds on Montgomery St. would be reduced by about 35% and those north and northeast of the building would be reduced by 28% under west winds. There would be increased street level turbulence at the intersections of Merchant and Clay Sts. with Montgomery St. Westerly winds north of the building would be about 5% greater than for the project, but the recirculation zone which would result from the project would not occur with Alternative Five. The vertical vortices which occur east of the Transamerica Pyramid under existing conditions, and which would occur with the project, would be eliminated with this alternative.

This alternative would result in demolition of the existing structures on the site and removal of the surface parking lot. Construction traffic, noise and air quality effects would be similar to the proposed project. Operational traffic impacts would be less than those of the proposed project due to the smaller size of the office portion of the building. Energy consumption for the office and residential space would be about 10% less than for the project.

The project sponsor has rejected this alternative as not providing the amount of office space permitted under the City Planning Code and proposed for the project. In addition, the project sponsor considers the 250 ft. height limit recommended in Guiding Downtown Development an unnecessary limitation on the development potential of the site.

## VIII. Relationship Between Short-Term Use and Long-Term Productivity

### VIII. RELATIONSHIP BETWEEN SHORT-TERM USE OF MAN'S ENVIRONMENT AND THE ENHANCEMENT OF LONG-TERM PRODUCTIVITY

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This project would be part of a trend of denser development in Downtown San Francisco, contributing to a skyline characterized by high-rise office buildings in an area that is already urbanized. This area supplies facilities that provide employment opportunities and the basis for the regional economy. The project is intended to supply office space in the Downtown area to partially meet current demand. Approval by the Board of Supervisors and City Planning Commission of an amendment to the City Planning Code to allow approval of the project as proposed could result in denser downtown development and in the provision of more housing in mixed-use buildings in the downtown.

## IX. Irreversible Environmental Changes

### IX. IRREVERSIBLE ENVIRONMENTAL CHANGES

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The project would result in the removal of two existing structures on the site, neither of which are listed in the City Planning Commission's official list of Architecturally and/or Historically Significant Buildings in the Downtown. The 643 Montgomery St. building, the Iron Pot Restaurant, a parking lot, and a vacant lot would be replaced by a 24-story building. Demolition and construction would result in an irreversible commitment of material and energy resources. For the life of the proposed building, operation and maintenance would entail the use of mechanical equipment and energy consumption, as well as effects on air quality, water usage, and wastewater and solid waste disposal. The project would shade streets and sidewalks in the Jackson Square Historic District and project vicinity by eliminating existing corridors of sunlight between combinations of existing structures.

● X. SUMMARY OF RESPONSES AND COMMENTS

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A. INTRODUCTION

This document contains summaries of the public comments received on the Draft Environmental Impact Report (DEIR) prepared for the proposed Montgomery - Washington Building, and responses to those comments.

All substantive spoken comments made at a public hearing before the City Planning Commission, December 17, 1981, and all written comments received during the public review period from November 13, 1981 through December 17, 1981, have been reviewed and are presented herein by direct quotation, edited for repetition and nonsubstantive material only.

Comments and responses are grouped by subject matter and have generally been arranged by topics corresponding to the Table of Contents in the Draft EIR. Each group of comments is followed by its set of responses; the order of the responses under each topic follows the order of comments under that topic. As the subject matter of a topic may overlap that of other topics, the reader must occasionally refer to more than one group of Comments and Responses to review all information on a given topic. Where this occurs, cross-references are provided (e.g. "See also first Response on p. 12").

These comments and responses will be incorporated into the Final EIR as a new chapter. Text changes resulting from comments and responses will also be incorporated into the Final EIR, as indicated in the responses.

B. LIST OF PERSONS COMMENTING

Toby Rosenblatt, President, San Francisco, City Planning Commission, and  
Susan Bierman, Commissioner  
C. MacKey Salazar, Commissioner  
Yoshio Nakashima, Vice President

Gordon Chin, Executive Director  
Chinatown Neighborhood Improvement Resource Center

John Elberling,  
San Franciscans for Reasonable Growth

Sue Hestor (speaking on behalf of herself, Carl Imparato, David Jones, John  
Eberling, and Kay Pachtner)

Paul H. Hughes, Acting District CEQA Coordinator  
Caltrans

Harold L. Moose, Jr., President  
Justice Enterprises, Inc.

Sue Smith

Susan Tam, Sr. Recruiter/Counselor  
Chinese for Affirmative Action

Michael Visconti, Program Manager, Plan and Project Review  
Association of Bay Area Governments

C. SUMMARY OF COMMENTS AND RESPONSES

PROJECT DESCRIPTION

Observation Deck

COMMENTS

"On p. 14, I gather that the ... next to the last sentence describes the observation deck....I think I would like a little more specific description of that observation deck, if that's what it is, and what the public access is and the hours, possible hours, of operation." (Vice President Nakashima)

"I would note this has another one of those lurking observation decks. I want to know who has access to the observation deck." (Sue Hestor)

"Page 25 [paragraph one], the rooftop observation deck doesn't seem to have public access....If it does not, how can it be included as a bonus?" (Commissioner Bierman)

RESPONSE

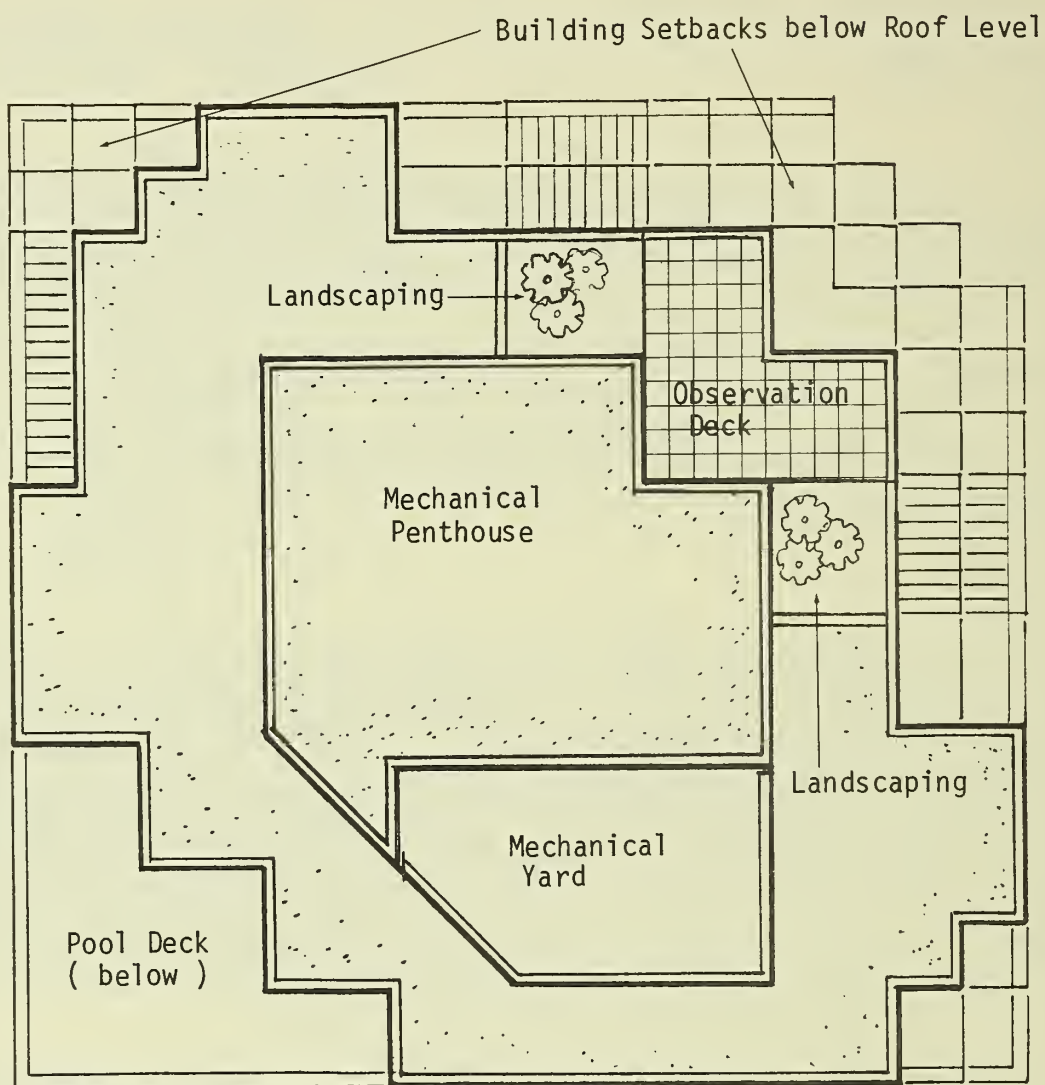
The rooftop common open space, described in the next to the last sentence on p. 14 of the DEIR, refers to the public observation deck. The observation deck, containing approximately 750 sq. ft. of space and accommodating about 50 persons, would be located at the northeast corner of the roof as shown in Figure 8A, Roof Floor Plan, p. 145. (Figure 8A is to be added following Figure 8 on p. 20 of the DEIR.). At the time the DEIR was published, it was proposed that, in addition to the observation deck, about 10,000 sq. ft. of common open space would be provided on the rooftop for building residents. This common open space on the rooftop has been eliminated as a result of refinement of the building design; the observation deck would be the only open space provided on the roof (See also the Response on p. 156, regarding open space).

The public would reach the observation deck via a freight elevator from the ground floor to the 24th story, the top residential floor. From this level, a stairway, and possibly a hydraulic lift, would allow access to the rooftop observation deck. Access to the observation deck by the public would be monitored by a security guard at the ground floor; the security guard would control operation of the freight elevator. According to the project sponsor, the observation deck would be open to the public during normal business hours.

Requested Bonuses

COMMENT

"Ref: the bonuses requested - need a diagram/floor plan to show location of amenities provided, particularly observation deck." (President Rosenblatt)



SOURCE: Kaplan/McLaughlin/Diaz

● FIGURE 8A: Roof Floor Plan

## RESPONSE

The observation deck is shown in a new Figure 8A (p. 145 of this document), to be incorporated into the DEIR following Figure 8, p. 20. Ground-floor bonus features, including multiple building entrances, sidewalk widening and shortened walking distances are shown in a new Figure 11A (p. 147 of this document), to be added following Figure 11 on p. 24 of the DEIR. The remaining bonus feature, parking access, cannot be illustrated in a diagram or floor plan. As defined in Section 126(3) of the City Planning Code, parking access "shall be from the subject building directly to an automobile parking structure located elsewhere than in the areas of concentrated development of the C-3-0 and C-3-R districts....The access shall be open during all business hours for use by occupants or visitors to the subject building and marked for their use..."

Requested bonus space is shown in Table 1 on p. 26 of the DEIR. Calculations for individual bonus features, as described in Section 126 of the City Planning Code are shown in Table 1A (p. 146 of this document), to be added following Table 1 on p. 26 of the DEIR.

TABLE 1A: BONUS CALCULATIONS

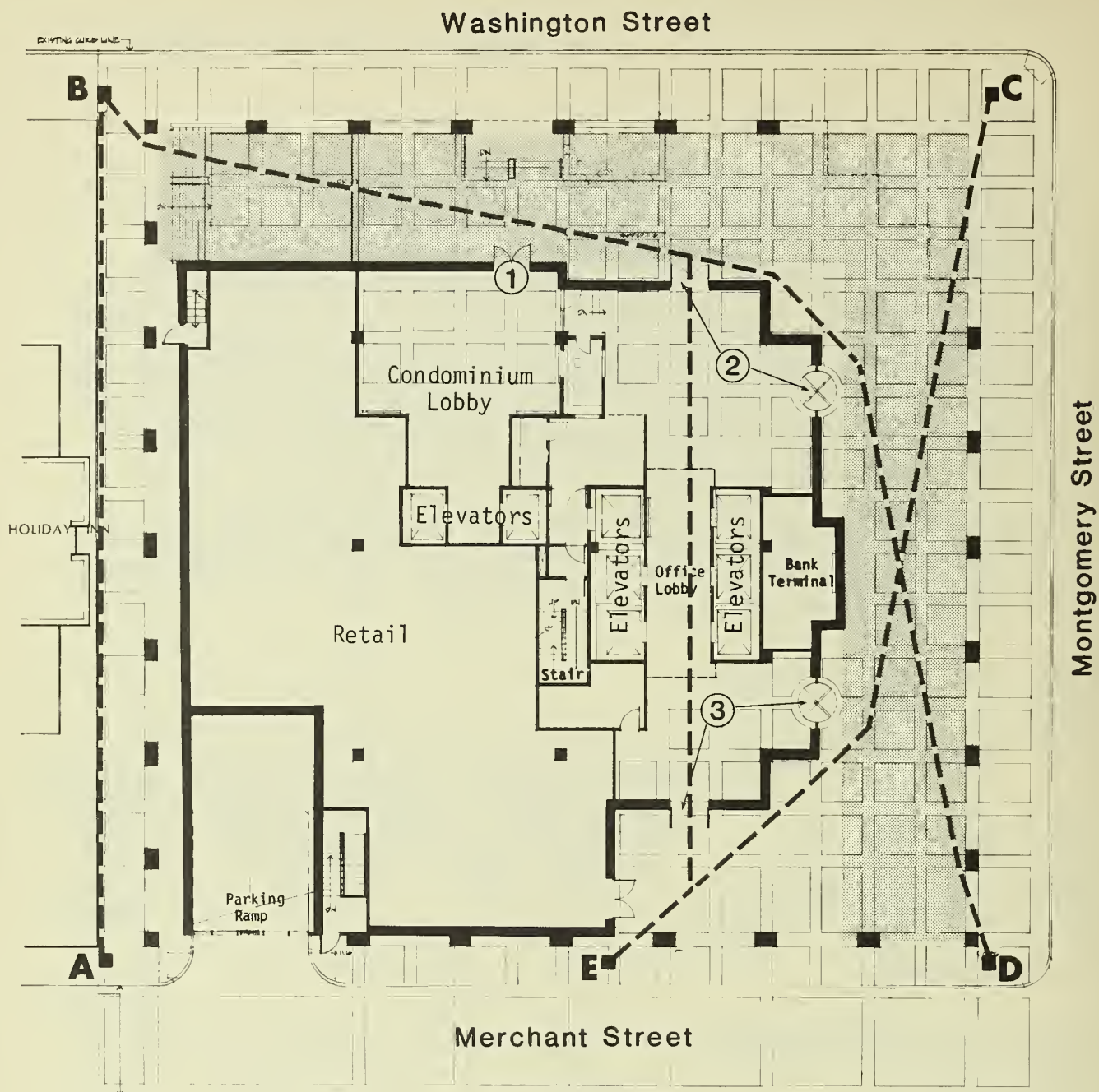
<u>Bonus Feature Requested</u>	<u>Sq. Ft. of Bonus Floor Area per Unit of Feature</u>	<u>Maximum For Bonus (Percent of Basic Gross Floor Area)</u>	<u>Requested Project Bonus</u>
MULTIPLE BUILDING ENTRANCES (three major entrances provided)	10,000	5	12,200 (maximum)
SIDEWALK WIDENING*	7	15	36,500 (maximum)
SHORTENED WALKING DISTANCE**	40	10	19,800
OBSERVATION DECK	10,000	Not Applicable	10,000
PARKING ACCESS***	100	5	<u>5,200</u>
TOTAL REQUESTED BONUS FLOOR AREA			83,700

\* Sidewalks would be widened 21.5 ft. on both Montgomery and Washington Sts. over a total distance of 245 ft.:  $21.5 \times 245 \times 7 = 36,872$ , which is greater than 15% of the Basic Gross Floor Area.

\*\*total shortened walking distance from Figure 8A would be 495 ft.

\*\*\*62 spaces - 10 spaces required by Code for residential use = 52 spaces

SOURCE: Kaplan/McLaughlin/Diaz



## LEGEND

- ① Building Entrances
- Project Walking Distances
- Area of Sidewalk Widening



COMMENT

"In the next to last paragraph on p. 51, the third line, doesn't give the proposed square footage of the pedestrian way; it just talks about the pedestrian way, but does not clarify [it]." (Commissioner Bierman)

RESPONSE

Revise the first sentence of paragraph two on p. 21 of the DEIR to read: "The proposed building would have a pedestrian area outside the building containing approximately 6,600 sq. ft. with widened sidewalks, multiple building entrances and pedestrian walkways,..." Revise the sixth sentence (lines 10-11) of paragraph two on p. 51 of the DEIR to read: "The project as proposed would have an open pedestrian way outside the building containing approximately 6,600 sq. ft. as public open space." See also the Response to the immediately preceding comment for a discussion of requested bonus space for sidewalk widening and Figure 11A, p. 147, which shows ground-floor bonus features.

Building Materials

COMMENT

"On p. 21, [the EIR talks] about tinted glass and then also the use of opaque and tinted glass. I gather that's light opaque and not dark opaque. Dark opaque glass would reflect pretty good, I think." (Vice President Nakashima)

RESPONSE

Due to a typographical error, a word was omitted from the sentence to which the comment refers. Delete the last sentence of paragraph one on p. 21 and the last sentence of paragraph three on p. 54 of the DEIR and replace with the following: "The building setbacks would be distinguished from the rest of the facade by a combination of opaque materials and tinted glass." As noted in the first paragraph on p. 62 of the DEIR, under Relationship of Project to Policies, the building would contain no reflective glass.

Lot 25

COMMENTS

"On p. 27, the land cost of \$10 million; does that include the price they paid for Lot 25?" (Vice President Nakashima)

"Page 32-revise to reflect purchase of Lot 25 by sponsor or eliminate discussion altogether, since they own it now and it's part of project." (President Rosenblatt)

RESPONSE

According to the project sponsor, the land cost of \$10 million given in paragraph two on p. 27 of the DEIR includes the purchase price of Lot 25.

## X. Summary of Comments and Responses

The land cost estimate in the DEIR includes a projection by the sponsor for the purchase of Lot 25 in anticipation of acquiring the subject property. The project sponsor purchased Lot 25 from the City at a public auction held on November 17, 1981, for \$3.8 million.

Delete the first two sentences of the first full paragraph on p. 32 of the DEIR and replace with the following: "The four parcels comprising the project site are owned or controlled by the project sponsor. Lot 25, at the corner of Washington and Montgomery Sts., formerly in City ownership, was purchased by the project sponsor at a public auction on November 17, 1981." Delete the first sentence of paragraph one on p. 50 of the DEIR and replace with the following: "The project site includes a 4,820-sq.-ft. parcel (Lot 25), formerly in City ownership." Delete the last sentence of paragraph two on p. 50 of the DEIR and replace with the following: "The project sponsor purchased Lot 25 at a public auction on November 17, 1981." Revise the first and second sentences of the first paragraph under Alternative Four: Reduced Site Alternative, on p. 131 of the DEIR to read: "This alternative would develop three of the four parcels owned by the project sponsor. Lot 25, formerly in City ownership, would remain vacant."

### ENVIRONMENTAL SETTING AND IMPACTS

#### Land Use and Zoning

##### Floor Area Ratio (FAR)

#### COMMENTS

"The design [is described] for example, on p. 1, as being 300 ft. high. On p. 3, it exceeds the FAR ratio, which is 14 to 1. It will be 19 to 1, which is 5 to 1 over. That's about 30 percent over the floor area ratio." (Sue Smith)

"On p. 7, it admits that the allowable, it will be over the allowable basic floor area, in the third paragraph, by 86,000 sq. ft. And that does not include, I believe, 25,000 ft., sq. ft., of parking." (Sue Smith)

"The proposed F.A.R. for the project is 19:1 which exceeds both the present requirements of the City Planning Code and Interim Controls and the recommendations for Guiding Downtown Development." (Gordon Chin)

"The two immediately adjacent buildings to the east and west, Transamerica and Holiday Inn, have FAR's respectively of 9.4 and 9.7 and have not occupied their entire sites. The proposed project has a FAR of 19.1 and occupies virtually its entire site." (Harold L. Moose, Jr.)

#### RESPONSE

As noted in paragraphs two and three on p. 47 of the DEIR, the gross floor area of the commercial portion of the building, approximately 243,600 sq. ft., represents the Basic FAR of 14:1 allowed by Section 124 of the City

## X. Summary of Comments and Responses

Planning Code. Development bonuses, described in Section 126 of the Code, could permit floor area in addition to the Basic FAR. Permitted bonus floor area may be applied only to residential uses under the limitations of the Interim Controls (Municipal Ordinance 240-80, effective July 1, 1980). A Conditional Use authorization would be required by the Interim Controls to permit the use of bonus floor area for residential use on the site (see p. 28, paragraph two of the DEIR).

The project sponsor intends to request approximately 83,700 sq. ft. of bonus floor area for housing. Bonus space identified by the project sponsor could allow a total gross floor area for the building of about 327,300 sq. ft., an FAR of about 18.8:1. This floor area would be about 34 % over the Basic FAR of 14:1, but could be permitted by the bonus provisions of Section 126 of the City Planning Code and the Interim Controls.

The project plans propose 88,100 gross sq. ft. of housing, resulting in a total gross floor area for the building of approximately 331,700 sq. ft., about 4,400 sq. ft. more than the identified bonus space would permit. This would result in an FAR of 19.1:1. This floor area, about 36 % over the Basic FAR of 14:1, would be approximately two percent over the permitted FAR based on requested bonuses. Because the project would exceed the allowable FAR of 14:1 plus identified bonus space by about 4,400 sq. ft., it would not conform to the City Planning Code. An amendment to the City Planning Code, and possibly a change in the Interim Controls, would be required to allow approval of the project. A number of ways in which the Planning Code or Interim Controls could be modified to permit the amount of on-site housing proposed are described in paragraph one on p. 48 of the DEIR.

As defined by Section 102.8 of the City Planning Code, Gross Floor Area used to determine a building FAR does not include the square footage for accessory off-street parking and freight loading spaces.

As described on p. 51, paragraph one of the DEIR, the gross commercial floor area of the project would exceed the commercial FAR of 12:1 recommended in Guiding Downtown Development (GDD) by 2:1. The 5.1:1 FAR proposed for housing would exceed the maximum FAR of 5:1 recommended in GDD for on-site housing by 0.1:1. At a total FAR of 19.1:1, the project would exceed the GDD recommended maximum FAR of 17:1 by 2.1:1.

Delete the last sentence (lines 7-9) of paragraph one on p. 30 of the DEIR and insert the following: "The 850-ft. Transamerica Pyramid (FAR of about 9.4:1) and the 280-ft. 601 Montgomery St. (FAR of about 16.5:1) high-rise office buildings are located immediately east and south, respectively, of the project site. The Holiday Inn, directly west of the site is about 300 ft. tall (FAR of about 9.7:1)."

Delete the first sentence of the third full paragraph on p. 32 of the DEIR and insert the following: "The site is located immediately south and southwest of the Jackson Square Historic District. The area north of the project site is located in the C-2 zoning district with a Basic FAR of 3.6:1 and a height limit of 65 ft. (see Figures 12 and 13, pp. 31 and

## X. Summary of Comments and Responses

33). The southern part of the Jackson Square Historic District is classified as a 'special exception' height zone, according to Section 263.1 of the City Planning Code." As described further in this paragraph, this zoning designation allows the southern edge of Jackson Square to serve as a transitional height zone, to produce a stepping down of height from the Downtown Office district to the smaller structures in the Jackson Square and Telegraph Hill areas.

As shown in Figure 4 on p. 16 of the DEIR, the project would not extend to the site property line on all sides. The project would be set back from the corner of Montgomery and Washington Sts. and would be separated from the Holiday Inn along the western property line by approximately 10 ft.

### Conformity with the City Planning Code

#### COMMENTS

"[The EIR] seems slanted in terms of editorial comment, pushing for changes in the Code. I don't think that is really the business of an EIR. If people want to start rezoning or changing Codes or whatever, I would say they ought to get their friendly Supervisor to do it or us to do it in some formal way, but not to push Code changes just because you want some extra residential units. I don't know whether it belongs in an EIR." (Commissioner Bierman)

"In too many places...this EIR relies on the fact that they think they are going to get all kinds of variations from the Planning Code....If that is the way the game is going to be played, every developer is going to play the same game. This EIR is therefore warped because everything is skewed towards the strange case of getting the Planning Code amended to accommodate this one project....It's bizarre reading pp. 2 and 3, which is the summary, and pp. 25 and 26, which is where they discuss the project in relation to the current zoning....I seriously think that the EIR needs to be rewritten...to bring it back to reality....I mean, we could have an EIR that analyzes something twice as large, twice as dense, then you would only have as an alternative something that complied with the Code. That makes the burden on those of us who want real alternatives that aren't as high as the Code even harder. Maybe that is what is being done, so that when they come down to what the Code allows, everyone breathes a sigh of relief and says, 'Whew, they're down to merely the maximum.' Well, the maximum is pretty dense and pretty high for that site....This is right across the street from a lot of low brick buildings....In terms of p. 48, that's another modification of the Code provision." (Sue Hestor)

"I particularly was offended with -- we're going to just change PUD's [Planned Unit Developments] from a half acre to a third of an acre. I mean, that's pretty grabby, since PUD is not an entitlement anyway; you're supposed to have some benefits from a PUD." (Sue Hestor)

#### RESPONSE

The DEIR is an informational document and makes an objective presentation of fact. The project as proposed would exceed the Basic FAR of 14:1 plus

## X. Summary of Comments and Responses

identified bonus space and therefore, would not conform to the City Planning Code. Because the project would not conform to the Code (see Response pp. 149-150), an amendment to the Code, and possibly a change in the Interim Controls, would be necessary to allow the City Planning Commission to approve the project as proposed (as noted in the DEIR, in the first paragraph on p.3, the first paragraph on p.25, and the last paragraph on p.47). For the information of the decision-makers and the public, the DEIR describes on paragraph one of p. 48 several ways in which the Planning Code could be modified to permit the amount of on-site housing proposed, but does not make editorial comment either encouraging or discouraging such Code changes. The DEIR outlines possible changes which could be made to allow approval of the project in the form in which it is currently proposed, should the Board of Supervisors and City Planning Commission so desire. Any one of the described Code modifications, including a change in the minimum site size necessary for a PUD, could allow approval of the project. As noted on p. 28, paragraph one of the DEIR, according to Section 302 of the City Planning Code, an interested property owner may not initiate changes in the text of the Code. The Zoning Administrator is responsible for recommending appropriate changes in the Code; a Code amendment may be initiated only by the Board of Supervisors or by a resolution of intention by the City Planning Commission. The City Planning Commission is required to hold a hearing on any proposed amendment. Once approved by the Commission, a proposed amendment must be presented to the Board of Supervisors and the Board must adopt the amendment by a majority vote.

The EIR considers, as the proposed project, the largest development under consideration by the project sponsor for the site in order to present a worst-case analysis of environmental impacts, thus permitting the decision-makers to amend the Code and approve the project as proposed, should they choose to do so; they may also disapprove the project. The EIR examines a number of alternatives to the project as proposed (see Section VII, pp. 126-139 of the DEIR). Alternative One would develop a combined office and residential building at approximately the maximum floor area permitted by the City Planning Code and Interim Controls. In addition to the No Project Alternative, the DEIR considers three other alternatives which would range in height from 215 to 272 ft. Alternatives Three, Four and Five also vary in the provision of on-site housing, amount of site coverage, and ground-floor plan. The City Planning Commission may approve Alternative One (Code Conforming Alternative) or any of the other alternatives described in the DEIR, all of which conform to the Code, but may not approve the project as proposed without modification of the City Planning Code. (See also the Response on pp. 196-198 which describes an additional Alternative to the proposed project.)

### Height and Bulk

#### COMMENT

"On p. 6, the only reference to the actual heights in the neighborhood...describes Jackson Square as being two to six stories, when the average is clearly probably 30 or 40 feet." (Sue Smith)

## X. Summary of Comments and Responses

### RESPONSE

The above Comment apparently refers to a p. 6 in the Final Initial Study, not the DEIR. The Final Initial Study is included as Appendix A, pp. 214-247. Paragraph two on p. 221 (p. 6 of the Final Initial Study) and paragraph two on p. 54 refer to the smaller-scale two- to eight-story structures which characterize the Jackson Square Historic District. These statements apply to the entire Historic District and include the 108-ft.-high Pacific Lumber Company Building under construction on the corner of Washington and Sansome Sts. Paragraph two on p. 30 of the DEIR states that buildings in the Jackson Square Historic District in the site vicinity are two to four stories in height. Data collected for the wind tunnel study on blocks in Jackson Square near the project site indicate an average building height on these blocks of approximately 35 ft.

### Adjacent Land Use

#### COMMENTS

"Page 21. Has the Landmarks Board looked at this building in relation to its appropriateness as a neighbor to Jackson Square? If they have not yet, would they please comment." (Commissioner Bierman)

"Page 60 of the EIR discusses relevant policies of the City's Urban Design Plan as they relate to the proposed project. Policies call for respecting the character of older nearby development and promoting harmony in the visual relationships and transitions between new and older buildings. The proposed building is 300 feet tall. Even with upper level setbacks, the desired transition in height and bulk between it and the fine-grained Jackson Square buildings does not occur, the transition is too sudden." (Harold L. Moose, Jr.)

"What this will do is give a very visible barrier....The Transamerica [building] has some problems, but at a certain level, the Transamerica Building is not a barrier like some of those blocky buildings, because its shape is so bizarre. This will give a hard edge to the northern boundary of the C-3-0 district that will be so visible...because it will be a wall. Then you will have these cute little buildings. There needs to be more respect for the site to the north, which is a very important area, as well as the site to the west, which is Chinatown....You've got real scale problems." (Sue Hestor)

### RESPONSE

The DEIR was distributed to Jonathan Malone, Secretary of the San Francisco Landmarks Preservation Advisory Board, and no comments were received from the Board concerning the DEIR. At the request of the commenter, the Landmarks Board intends to consider the relationship between the proposed project and the Jackson Square Historic District at a public meeting on January 20, 1982. According to Section 1006 of the City Planning Code, a Certificate of Appropriateness is required only for projects on a landmark site or within an historic district. The Jackson

## X. Summary of Comments and Responses

Square Historic District, which does not include the project site, is established by Appendix B to Article 10 of the Code. Section 5 of Appendix B describes the characteristics of Jackson Square supporting its designation as an historic district. With respect to the relationship between the Jackson Square Historic District and nearby high-rise development, subsection 5(d) states that the district's "distinct quality is further enhanced by a downtown location, affording an impressive contrast with the adjacent office core." The subsequent subsection (5(e)) notes that the contrast with surrounding areas contributes to the visual unity of Jackson Square.

The DEIR discusses the scale of the proposed project in Table 3 on pp. 60-62. In the second paragraph on p. 60, under Relationship of Project to Policies, it is noted, "Together with the adjacent high-rise buildings, the project would define the northern edge of the Financial District and provide some transition between taller buildings nearby and the smaller buildings of the Jackson Square Historic District. The project together with the Holiday Inn could result in a wall effect emphasized by identical building heights, although project setbacks are intended to avoid this effect." Paragraph three under Relationship of Project to Policies, on p. 61 states, "The project would represent a departure in style and scale from the neighboring Jackson Square area....The upper-level setbacks would provide some transition between the taller Financial District buildings and the low-rise Jackson Square District." The scale of the project would contrast less with Chinatown than with the Jackson Square Historic District. Although Chinatown is characterized by low-rise structures, it also contains buildings such as the mid-rise 110-ft. China Trade Center Building on Brenham Place about two blocks west of the site and the high-rise 185-ft. Mandarin Tower at the corner of Stockton and Washington Sts. The 300-ft. tall Holiday Inn is between the project site and Chinatown.

### COMMENTS

"Page 30 has the comment that the Holiday Inn serves as an entrance to Chinatown. I think that should be struck. It's an addition that was put there. The cultural room it speaks of, as I recall, was a compromise for the loss of some of the park area. And that maybe should be stated...I think there was a compromise on the height of that building. I don't think that it's regarded as necessarily the entrance to Chinatown."  
(Commissioner Bierman)

"Under Environmental Setting, Land Use, no mention is made of the doors that the S.F. Redevelopment Agency required to be built on the east side of the adjacent Holiday Inn Hotel, in order to promote pedestrian circulation from Chinatown to the Financial District. (The doors would connect to any building built on the subject site.) Discussions are underway with the project sponsor to provide for such a connection and pedestrian access through the new building to Montgomery Street." (Harold L. Moose, Jr.)

## X. Summary of Comments and Responses

### RESPONSE

Delete the second sentence of the third paragraph on p. 30 of the DEIR which states that the Holiday Inn serves as an entrance to Chinatown, and replace with the following: "The Holiday Inn, on Lot 24 of Assessor's Block 208, is directly west of the site."

The Board of Supervisors requested, in its Resolution No. 124.65 (March 1, 1965), that the San Francisco Redevelopment Agency give attention to the area designated as the Portsmouth Corridor with a view of achieving a Chinese Cultural and Trade Center on the site of the old Hall of Justice, or as part of the redevelopment of the entire Assessor's Block 265. The Redevelopment Agency presented the Chinese Cultural and Trade Center Redevelopment Project Area Plan, which was approved by the Board with the adoption of Ordinance No. 278.65 on September 16, 1965. Construction of the Holiday Inn Hotel was in accordance with this Official Redevelopment Plan and with the condition that 20,000 sq. ft. of floor area be made available for Chinese Cultural and Trade Center purposes.

The Holiday Inn is approximately 300 ft. tall, the maximum permitted building height in the 300-H Height and Bulk District which includes the Holiday Inn and the project site.

Add the following two sentences to the end of the first partial paragraph on p. 32 of the DEIR: "As a condition of approval, doors were required to be provided on the east side of the Holiday Inn. These doors were to allow a direct connection between the Holiday Inn and a structure built on the project site to promote pedestrian circulation between Chinatown and the Financial District, within a Portsmouth Square Corridor." The corridor was to implement a planned second level pedestrian circulation system. (See Reponse on pp. 191-192 for further discussion of such a pedestrian connection)

### Guiding Downtown Development (GDD)

#### COMMENT

"To go from 300 ft. to 30 to 40 ft...does not meet the latest City Planning guidelines....He doesn't specify what those guidelines really would give us in terms of height....The project would exceed the height recommendations for the site contained in the Department of City Planning document Guiding Downtown Development. The question is: Why did we have an EIR which does exceed that? That is a bare minimum, to me, the Guiding Downtown Development, when it is within 50 ft. of the Jackson Square Historic District." (Sue Smith)

#### RESPONSE

Guiding Downtown Development contains a series of regulatory proposals for managing development in downtown San Francisco. The proposed revisions to the Comprehensive Plan and City Planning Code contained in GDD are undergoing environmental impact analysis in the so-called 'Downtown EIR'. In addition, the City Planning Commission has required (under Resolution

No. 8982, effective June 4, 1981), that Draft EIRs for individual projects include, as an alternative for environmental evaluation, a building proposal that would comply with the proposed controls contained in GDD. Alternative Five, described on pp. 134-139 of the DEIR represents an alternative which would comply with GDD. The Planning Commission has expressed its intent to consider the extent to which individual projects meet the general intent of the proposed revised controls contained in GDD. The discussion on p. 51 of the DEIR considers the extent to which the proposed project would conform to the recommendations contained in GDD. While GDD proposals are considered in project approval, the current provisions of the City Planning Code contain the required controls.

Page 51, paragraph one, line seven, of the DEIR states that the allowable height for a structure on the project site would be reduced from 300 ft. to 250 ft., under the recommendations contained in GDD. See, also, the Response on pp. 153-154 which addresses the contrast between the Jackson Square Historic District and the downtown office core.

#### Open Space

#### COMMENT

"Open Space - The proposed project would provide approximately 17,500 sq. ft. of common and private open space for project residents. Although this amount is greater than that required by the Planning Code, it is inconsistent with the City's requirements for Guiding Downtown Development. GDD recommends that one sq. ft. of public recreation/open space be provided per 25 sq. ft. of gross floor area. In the case of the proposed project, about 13,270 sq. ft. of open space 'easily accessible to the general public' (GDD) is required." (Gordon Chin)

#### RESPONSE

As noted in the Response to the preceding Comment, Guiding Downtown Development contains a series of regulatory proposals for managing development in downtown San Francisco. While GDD proposals are considered in project approval, they are not requirements; the current provisions of the City Planning Code represent the current required controls. The amount of open space recommended for the proposed project based on the GDD guidelines (about 13,200 sq. ft.) is noted on p. 51, paragraph two (lines 6-8) of the DEIR. Alternative Five, described on pp. 134-139 of the DEIR, would be designed to comply with the guidelines contained in GDD. As noted in paragraph two on p. 137 of the DEIR, the open space requirement for Alternative Five of about 9,800 sq. ft. could not be met on-site. For this alternative, the required open space would have to be provided off-site at another location in a C-3-0 district, as allowed by GDD.

As a result of refinement of the building design since publication of the DEIR, the amount of open space proposed as part of the project has been reduced from 17,500 to 8,250 sq. ft. The open space described in the DEIR includes 10,000 sq. ft. of rooftop, common open space. The observation deck, containing about 750 sq. ft. of space would now be the only open

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space provided on the roof; the additional common open space has been eliminated on the rooftop. Delete the last two sentences (lines 9-11) of paragraph two on p. 14 of the DEIR and replace with the following: "There would be a public, rooftop observation deck, of about 750 sq. ft., and a mechanical penthouse. Total open space proposed as part of the project would be about 8,250 sq. ft." Revise the last sentence (lines 5-8) of the first full paragraph on p. 49 of the DEIR to read: "The project would include about 8,250 gross sq. ft. of common and private open space for project residents including 750 sq. ft. of public open space and would comply with the open space requirement for residential use in the C-3 District (Section 135 (d) of the City Planning Code)." As noted in paragraph two on p. 14 of the DEIR, the first residential floor would contain a common patio and pool area, of about 3,100 sq. ft., and most residential units would have a private balcony or terrace for a total of about 4,400 sq. ft. of private open space.

### Urban Design

#### Shadow

#### COMMENTS

"My window...is directly impacted....Five hours of sunshine are going to be lost over Jackson Square during the winter months....All of the [Jackson Square] structures do have skylights and because they're low... and also, of course, none of them can have central heating--the impact is going to be very severe." (Sue Smith)

"Carl Swain of Jackson Square Association would like me to express for them their very serious concerns about the impact on Jackson Square. Caesar Belli,...the owner of the building in which I am, has also expressed very serious objections to the shadow pattern. I would therefore ask that a full assessment be given to the alternative which would not add shadow,...to any Jackson Square projects." (Sue Smith)

#### RESPONSE

As noted in paragraph one on p. 63 of the DEIR, "the project, in replacing low-rise structures on the site, would create more extensive shadow patterns than exist at present. Much of the project shadow patterns would coincide with those cast by existing structures in the area." During the afternoon hours in the winter months the project would increase shading on Jackson Square by eliminating the existing corridor of sunlight between shadows from the Holiday Inn and 601 Montgomery St. buildings (see Figure 22 on p. 64 of the DEIR). Project shadows would not eliminate sunshine on any structure in Jackson Square for the entire afternoon. Project shadows would be primarily confined to buildings shaded by existing high-rise structures earlier and/or later in the day. The project would shade portions of the block bounded by Montgomery, Jackson, Sansome and Washington Sts. throughout the afternoon during the winter months. To eliminate any shading on this block during the winter months, a structure constructed on the project site would have to be less than about 30 ft. in height. The winter months represent the worst-case for shadow impacts;

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however, because of the low sun-angle during the winter the effect on natural lighting and heating in Jackson Square structures would not be as great as for other seasons of the year.

During the summer months, project shadows on structures north of Washington St. would be less than at other times of the year (see Figure 24 on p. 66 of the DEIR). Buildings at the northeast corner of Montgomery and Washington Sts. would be shaded during the mid-afternoon; these would be the only Jackson Square structures shaded by the project in the summer. In the spring and autumn, the project would newly shade portions of the block bounded by Montgomery, Jackson, Sansome and Washington Sts. (including the old Transamerica building) during the afternoon (see Figure 23 on p. 65 of the DEIR). The project would add new shadows primarily on structures on the east side of Montgomery St. in Jackson Square; these structures are shaded by the Transamerica Pyramid and Holiday Inn earlier and later in the day, respectively. Because the sun-angle would be higher than in winter, the effect of project shadows on natural lighting and heating on these Jackson Square buildings would be greatest during the spring and autumn.

Alternatives Three, Four and Five, discussed on pp. 129-139 of the DEIR range from 215 to 272 ft. in height and would result in reduced shadow effects in comparison to the project. (See also Response on p. 196, which describes an additional alternative which would reduce shadow effects on Jackson Square.)

### Visual

#### COMMENTS

"Page 52 under 'visual effects,' it says, 'The project would result in the destruction of two small-scale, brick structures and the construction of a 24-story building....' I think there ought to be an additional sentence, at least talking about the Iron Pot Restaurant. I think that's a tradition and should be mentioned." (Commissioner Bierman)

"In the Visual Aspects portion of the Environmental Setting chapter, it should be noted that the Holiday Inn was designed with the requirement that it be oriented east-west and be set back from Washington and Merchant Streets above its base to preserve views to the east from Chinatown and areas from the west. The Transamerica building is also set back from Washington Street for this purpose. The proposed project would intrude into the set back area along Washington and Merchant Streets and block those views from the west." (Harold L. Moose, Jr.)

"In the Land Use and zoning portion of the Environmental Impact Chapter, regarding the 'Portsmouth Corridor', the proposed project will block short-range views of Portsmouth Square and of the Holiday Inn (including its two building signs), from Washington Street east of Montgomery Street." (Harold L. Moose, Jr.)

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"The Design section of the Environmental Impact Chapter states on page 54 that the upper portion of the proposed tower would be shaped so that the vertical elements of the project would be in different planes than those of the adjacent Holiday Inn, providing a visual separation of the two buildings. It is this placement of that vertical plane that would extend further north than the Holiday Inn and block the views to the east. If a definition between the two structures is desired, a portion of the northwest corner of the proposed structure should be set back at a diagonal where it abuts the Holiday Inn. This is proposed to be done at the upper residential levels, and should be carried down to the base of the building." (Harold L. Moose, Jr.)

### RESPONSE

The Iron Pot Restaurant is discussed in the Final Initial Study for this project. The Final Initial Study is included as Appendix A, pp. 214-247. As noted on p. 238, paragraph two, "The one-story building at 639 Montgomery St., occupied by the Iron Pot Restaurant...was a site of bohemian cultural activity during the 1940's and early 1950's related to the so-called Montgomery Block."

Regarding the comment about Holiday Inn and Transamerica requirements, insert the following sentence after the first sentence (lines 1-5) of the last paragraph on p. 49 of the DEIR: "As a condition of approval, it was required that the Holiday Inn be oriented in an east-west direction and be set back from Washington and Merchant Sts. above its base to preserve views within the Portsmouth Corridor." As noted in the first full paragraph on p. 53 of the DEIR, the project would partially block short-range views of some buildings from the Portsmouth Square area, but it would not obstruct any views of the Bay, as buildings east of the project site presently block such views.

As shown in Figure 21 on p. 59 of the DEIR, the project would block few short-range views of the Washington St. frontage of the Holiday Inn or Portsmouth Square from nearby locations east of the site. The project would be in the same plane as the lower portion of the Holiday Inn along Washington St., with both structures extending to the property line. However, above its lower levels the facades of the Holiday Inn are set back from the north and south property lines.

An alternative which would be set back from the property line of the project site and preserve views within the Portsmouth Corridor is described as Alternative Four on p. 131-133 of the DEIR. See also the Response on p. 196 which describes an additional alternative intended to reduce the impact on views within the Portsmouth Corridor.

### Wind

### COMMENT

"Wind - Findings from the wind-tunnel study indicate that considerable wind effects would be created by the proposed project (p. 69): 'A moderately high wind speed ratio would prevail on Montgomery Street....Wind speed ratios would more than double at the southeast corner of Columbus Avenue....Wind speed

ratios on Washington Street north of the site would increase about 30%'. These effects could be attributed to the orientation, size, shape and general design of the proposed structure. However, no modification of building scale or any other measures were proposed to mitigate the potential wind effects of the development." (Gordon Chin)

#### RESPONSE

As noted in paragraph four on p. 67 of the DEIR, wind speeds at pedestrian level can be predicted by comparing the ratio of pedestrian-level wind speed to the freestream wind speeds above the wakes of surrounding buildings. A high wind speed ratio does not directly indicate winds speeds that would cause pedestrian discomfort. The first full paragraph on p. 70 of the DEIR states that "pedestrian discomfort would not occur frequently in the project vicinity because, based on observed wind speed ratios, freestream wind of about 25 to 63 mph for northwest winds and 26 to 93 mph for westerly winds would be required for street-level winds to reach 12 mph." Freestream wind speeds necessary to result in pedestrian discomfort occur 3% and 7% of the time for northwesterly and westerly winds, respectively (see the last sentence of the first full paragraph on p. 70 of the DEIR).

### Employment, Housing and Fiscal Factors

#### Employment

##### COMMENT:

"Page 75. I think we need more detail about the work force figures for 601 Montgomery, if we are using it at all. We need to know how many are at the \$18,000 range and also how many at the \$12,000 range....It seems to me it's possible it has too many people at the higher range. It doesn't break the figures down enough. For instance, [the DEIR] says '34% of the office workers are professionals with salaries from \$55,000 to \$300,000'....That is just too big a spread....We need a lot more detail. Then it says 36% are support personnel from [\$]18,000 to [\$]35,000. We need, again, to know the breakdown of those figures. Then, 30 percent are clerical workers with salaries from [\$]12[,000] to [\$]29[,000]....The reason we need the breakdown is that in the housing, if we just go by those three categories, I don't think we'll get an accurate picture of what kind of housing is needed. I would suspect it's going to come a lot closer to, say, needing housing from [\$]12[,000] to [\$]25,000." (Commissioner Bierman)

#### RESPONSE

The tenant survey of the 601 Montgomery St. building was done by Trammell Crow Company, owner of that building and project sponsor for the Montgomery-Washington Building. The employment information was requested by the project sponsor of tenant businesses in the 601 Montgomery St. building; the survey data was collected by the Trammell Crow Company and used for the DEIR because comparable data from other sources are not available. Employment information publically available from the U.S.

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Department of Labor, Bureau of Labor Statistics and California Employment Development Department gives salary data for certain occupations (see DEIR, p. 75, second full paragraph) but not for most professional categories. A detailed breakdown of salary ranges from the 601 Montgomery St. tenant survey is not available based on confidentiality of the salary information. It should be noted that tenants of the 601 Montgomery St. building are primarily law, insurance, and professional service firms which have a larger proportion of management and professional staff than clerical staff.

Based on review of the tenant survey information from individual firms in the 601 Montgomery St. building received from the Trammell Crow Company, the DEIR may be revised as follows. Delete the sixth sentence (lines 10-14) of the second full paragraph on p. 75 of the DEIR and replace with the following: "The results indicate that about 34% of the office workers are professionals with salaries from \$21,000 to \$300,000 (average \$90,000); 36% are middle management with salaries from \$12,000 to \$70,000 (average \$45,000); and 30% are secretarial/support workers with salaries from \$10,000 to \$35,000 (average \$19,200)." The range of salaries for professionals is broader than that given in the DEIR based on the analysis of tenant survey information from individual firms. It should be noted that the term professional includes young workers just entering the labor force as well as corporation owners. Footnote 7 (p. 82 of the Draft EIR, cited on p. 75) is replaced to read: "/7/ Lynn S. Flach, Trammell Crow Company, written communication, November 6, 1981."

Delete the second sentence (lines 2-7) of the third full paragraph on p. 75 of the DEIR and replace with the following: "It is not known to what extent the tenant and employee composition of the proposed project would resemble that of 601 Montgomery St., but were the project to contain a similar distribution of office workers and salary ranges, then 34% of the project office workers could afford monthly mortgage payments of \$615 to \$8,750 (average \$2,625); 36% could afford from \$350 to \$2,040 (average \$1,315); and 30% could afford from \$290 to \$1,020 (average \$560)."

Delete the last sentence of the first partial paragraph on p. 76 of the DEIR and replace with the following: "Assuming 1.4 workers per household for professional and 2.0 workers per household for support and clerical, 34% of the project worker households could afford housing priced from \$71,000 to \$1,016,000 (average sale price \$305,000); 36% could afford housing from \$58,000 to \$338,000 (average sale price \$218,000), and 30% could afford housing from \$48,000 to \$169,000 (average sale price \$93,000)."

### COMMENT

"On p. 37, employment factors. You need a labor pool analysis. Because you continue to say so many jobs are being created, without understanding the need for those jobs and the skills that are available in San Francisco--residents that currently live here. And we have this fiction of jobs being created for San Francisco residents. That is, to a great extent, fiction, because we are creating jobs that are filled by immigrants into the city....You have to understand the impacts of the project in terms of meeting the needs of the

community that lives here now and that is unemployed here now....Also, how many new commuters and new employed residents and new downtown office workers were there in 1960, 1970 [will] there be in the 1980['s], will there be in 1990?" (Sue Hestor)

"On p. 110, growth inducement. The 101 Montgomery EIR had in it that only five to ten percent of the job growth would go to existing San Francisco residents....I think that should be in here, because that deals with how much growth flows from this project." (Sue Hestor)

"Upon review of the Montgomery-Washington Building Environmental Impact Report, Chinese for Affirmative Action found that the project sponsor, Crow-Spieker Companies, was deficient in addressing its affirmative action commitment in the employment portion of the project. The report indicated that the project will create 950 permanent and 150 construction employment opportunities. It, however, does not mention how these opportunities will benefit the surrounding community-Chinatown, and minorities of San Francisco...While the 1980 U.S. Census showed that Asian Americans represent 22% of the S.F. population, only 3.2% of the workforce in publicly-funded construction jobs are Asian Americans. The percentage in [sic] lower for privately-funded projects....Chinese for Affirmative Action urges the Department of City Planning to assure that the project will provide employment opportunities for the Chinatown community and the minorities of San Francisco. Crow-Spieker Companies must provide a plan to address the employment needs of minorities." (Susan Tam)

#### RESPONSE

As stated on p. 46, paragraph two of the DEIR, "the project would respond to the general objectives of the San Francisco Comprehensive Plan, and to the objective stated in Article 2, Section 210.3 of the City Planning Code, that the C-3-0, Downtown Office District play a leading national role in finance, corporate headquarters and service industries, and serve as an employment center for the region [emphasis added]." The labor pool from which project employees would be drawn includes the entire San Francisco Bay Area region. Some, but certainly not all, of the new employees would be in-migrants to the region. Employment opportunities for City residents, as well as the regional labor force, would expand due to the project and other cumulative downtown development. On the basis of the information contained in 101 Montgomery Street Final EIR, (pp. 289-309) precise quantification of the number of jobs generated by downtown office development which go to existing San Francisco residents is not possible because adequate data is not available. As a best estimate, between five and ten percent of people newly employed in San Francisco are expected to be San Francisco residents before getting their jobs. "These are people who either would have not worked or have worked outside San Francisco before getting their job in San Francisco." (101 Montgomery Street Final EIR, p. 301). The project would most likely provide jobs to San Francisco residents who are entering the work force, such as young people and re-entry women, as well as residents currently employed elsewhere or presently unemployed but previously employed in office work. It is not expected that employment opportunities in the project would be targeted towards the hard-core unemployed.

Permanent employment in the project would be provided by businesses which would be tenants in the proposed building. Only about ten building maintenance workers would be employed directly by the project sponsor (see Table 4, p. 71 of the DEIR). The project sponsor has no control over the hiring practices of potential tenants.

To address affirmative action in construction employment, insert the following Mitigation Measure under C. Employment, Housing and Fiscal Factors on p. 114 of the DEIR as a MEASURE UNDER CONSIDERATION.

"9A. The project sponsor could require the general contractor and subcontractors to implement affirmative action goals consistent with those established by the City's Human Rights Commission. Contractors needing assistance in meeting these goals may contact the Recruitment and Training Program (under the Comprehensive Employment and Training Act) and the San Francisco Building Trades Council. The Recruitment and Training Program can provide hiring lists of qualified women and minorities to contractors having difficulty meeting affirmative action goals."

#### Cumulative Office Development

##### COMMENT

"Also on p. 72, the projection for office growth needs to have in it the 26 million sq. ft. in the pipeline." (Sue Hestor)

##### RESPONSE

Based on revised information issued by the Department of City Planning, approximately 8.7 million gross sq. ft. of office space was approved or under construction as of November 1, 1981. Table C-1 on p. 266 is replaced with the following updated table (see p. 164). The first sentence of paragraph two on p. 72 of the DEIR is revised to read: "The proposed project, together with other major downtown office buildings under construction and approved (as of November 1981) would add approximately 8.7 million gross sq. ft. of office space if all were to be built (see Appendix C, Table C-1, p. 266)."

For certain environmental impacts that can be reasonably quantified, some proposed projects are included in the cumulative analysis. Table D-8 on p. 275 lists buildings considered in the cumulative transportation and air quality analyses; the Table includes, in addition to approved projects and those under construction, proposed projects that were well into detailed design and environmental review at the time the DEIR went to press. Proposed projects in the preliminary stages of design are not included in cumulative discussions because building sizes, uses, and other details are likely to change markedly during the planning process, or such projects may be withdrawn before approval. There is no published estimate available from the Department of City Planning as to the number of sq. ft. of office space "in the pipeline" at any given time.

TABLE C-1: MAJOR OFFICE BUILDING CONSTRUCTION AND CONVERSION IN SAN FRANCISCO  
AS OF NOVEMBER 1, 1981

Year	Total Gross Sq. Ft. Completed	5-Year Total	5-Year Annual Average	Cumulative Total All Office Bldgs. (Gross Sq. Ft.)	All Downtown Office Bldgs.** (Net Sq. Ft.)
Pre-1960				28,145,000(a)	24,175,000(b)
1960	1,183,000				
1961	270,000				
1962	--				
1963	--				
1964	1,413,000				
		2,866,000	573,200		
1960-1964		(2,580,000)	(516,000)	30,725,000	26,754,000
1965	1,463,000				
1966	973,000				
1967	1,453,000				
1968	1,234,000				
1969	3,256,000				
		8,379,000	1,675,800		
1965-1969		(7,541,000)	(1,508,000)	38,266,000	34,295,000
1970	1,853,000				
1971	--				
1972	1,961,000				
1973	2,736,000				
1974	2,065,000				
		8,615,000	1,723,000		
1970-1974		(7,753,000)	(1,550,000)	46,019,000	42,048,000
1975	536,000				
1976	2,429,000				
1977	2,660,000				
1978	--				
1979	2,532,000				
		8,157,000	1,631,400		
1975-1979		(7,341,000)	(1,468,000)	53,360,000	49,389,000
1980	1,284,000				
1981	3,138,000			57,340,000	53,369,000
Under Construction					
82,84	5,600,000				
1980-1984		(9,020,000)	(1,804,000)	62,380,000	48,409,000
Approved Projects	3,113,000			65,182,000	61,211,000

\* Net equals 90 % of gross. Net new space is added at an increase factor of 90%, since it is assumed that space equal to 10% of a new building is demolished to make land available for the new replacement building.

(a) S.F. Downtown Zoning Study - Working Paper No. 1, January 1966, Appendix, Table 1, Part 1. For pre-1965, includes the area bounded by Vallejo, Franklin, Central Skyway, Bryant and Embarcadero. Also includes 1/3 of mixed use retail/office. For post-1984, includes the entire city.

(b) Gross Floor Space for downtown offices are included for the following functional areas: Financial, Retail, Hotel, Jackson Square, Golden Gateway, Civic Center, South of Market, and Outer Market Street as defined in the 1/66 report. For post 1964, the entire area east of Franklin is included.

SOURCE: Department of City Planning

## Housing

### COMMENTS

"According to the Department of City Planning's housing formula, the project sponsor is required to provide 210 units of housing to meet the demand generated by the project. The 40 on-site, condominium units offered by the sponsor falls extremely short of meeting the City's housing mitigation measures." (Gordon Chin)

"Furthermore, the measure proposed by the sponsor does little in truly mitigating the housing impacts. The 40 condominium units are priced at between \$300,000 to \$350,000 each (1981 dollars). Yet, the price levels projected to be affordable by the majority of the future new employees of the building are estimated as follows in the D.E.I.R.:

'36% could afford housing from \$87,000 to \$169,000  
and 30% could afford housing from \$58,000 to \$140,000.'

"We fail to see how the housing impacts generated by the proposed project could be mitigated by the 40 luxury condo units." (Gordon Chin)

"In terms of mitigation measures on housing, p. 114, the project housing is aimed at a very limited market...\$300,000 to \$350,000 a unit. How much would you have to earn to be able to afford that housing?...There aren't a whole lot of people in that category. And is it really going to be for residents? Or is it going to be corporate condos?...I suspect, with the size of the units, that is what we are talking about. I suspect also that those prices are probably a bit low and that they will come on the market quite a bit higher...another \$100,000, at least...1,950 sq. ft. -- that's a big housing unit....You have to address in this EIR who is going to buy it. If...75% of [the housing units] are bought by corporations for corporate executive housing...that does not deal...with the San Francisco housing need." (Sue Hestor)

"How much of the housing growth that is discussed in this EIR is phantom housing? Because it is housing that, in theory, comes on the market and, in fact, is on the market but is not bought, according to Department of City Planning reports because the condos are overpriced, or because the economic factors in the economy can't support them. So if you have housing that comes on the market and doesn't serve residents because it is corporate housing or is not bought, it is fictitious housing; it really isn't serving anyone's need." (Sue Hestor)

"How are these kinds of condos taking away money from the hotels and from the hotel tax? If these condos are going to be marketed so as to avoid people staying in downtown hotels, I think you've got to start putting that in these EIRs...." (Sue Hestor)

"This project will result a net increase of 950 employees on site while providing 40 condominiums. According to the Draft EIR, these dwelling units will mitigate 20% of the housing generated by the project (p. 74). The Draft EIR also points out that by 1985 cumulative San Francisco housing demand

resulting from downtown office development will exceed the projected growth in City housing stock by an estimated 9,000-12,000 housing units (pp. 73-74). Given this projection, staff strongly urges that Mitigation Measures #10 (p. 114), in which the City Planning Commission would require the project sponsor to satisfy the remainder of the housing demand by development of units off-site, or by other means, such as contributions to a non-profit housing development corporation, be required as a condition of approval of the project." (Michael Visconti)

"Any unmet housing demand identified in the Impacts section and not specifically mitigated as a requirement of project approval and development must be specifically identified as unavoidable negative impacts on, respectively, overall housing demand and jobs/housing imbalance, rental housing demand/supply imbalance, "affordable" housing demand/supply imbalance by household income levels, and displacement of existing low/moderate income households. Such unavoidable adverse impacts must be stated not only for San Francisco but all Bay Area counties, separately." (John Elberling)

"In terms of p. 11, I again want to know: What is the demand for the type of housing that is being talked about?...Conditional uses are not entitlements, they are conditioned upon necessity. What is the necessity for this housing?...What is the real demand versus how many units are available for them to buy?" (Sue Hestor)

#### RESPONSE

As stated in the first full paragraph on p. 74 of the DEIR, "According to the Department of City Planning housing formula, which is under development, the proposed project would generate demand for about 210 units of housing in San Francisco." The project sponsor would provide 40 units of housing (see Mitigation Measure 9, p. 114) to partially mitigate the impacts on the housing market in San Francisco. This increased supply would meet some of the demand for housing in the City and thus reduce the demand pressure on other units. Since few project employees could afford these units, adverse housing impacts would remain. As stated in Mitigation Measure 10, p. 114 of the DEIR, "the City Planning Commission could require the project sponsor to satisfy the remainder of the demand by development of units off-site, or by other means such as contributions to a non-profit housing development corporation." The Commission would decide, as a condition of project approval, whether such a mitigation measure will be required.

Based on revised information from the project sponsor and architect, the fourth sentence of paragraph two on p. 27 of the DEIR is changed to read as follows: "Residential units are expected to sell for about \$300 per square foot, or from about \$312,000 to \$607,500 in 1981 dollars./3/" (Note /3/ on p. 29 of the DEIR is changed to read as follows: "Patrick Gilligan, Crow-Spieker Companies, oral communication December 30, 1981 and Kevin Cox, Kaplan/McLaughlin/Diaz, oral communication, December 31, 1981") The third sentence of the first full paragraph on p. 75 of the DEIR is changed to read as follows: "Units would contain from one to four bedrooms (1,040 sq. ft. to 2,025 sq. ft.); sales prices would vary by size and would range from about \$312,000 to \$607,500 (1981 dollars)." Due to

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inflation, these prices may increase before project completion. Based on the Department of City Planning housing formula, which assumes 1.8 working adults occupy each unit, the project housing would accommodate about 70 persons. As the proposed building would include primarily multiple-bedroom units, it is likely that actual occupancy would be higher.

The project sponsor could encourage owner occupancy in the project by means of covenants, conditions and restrictions in the deed. The project is, however, proposed to be open occupancy. There could be legal and enforcement problems in attempting to limit sales to corporations of project housing units. If a corporation intended to buy a housing unit and were to purchase one of the project condominiums, the corporation would not buy a unit elsewhere in the City. Therefore, if a corporation were to buy a project condominium, another unit elsewhere in the housing market would be available for purchase by other buyers. If a corporation intended to buy a housing unit for the purpose of housing visiting out-of-town employees, clients or customers, then whether such a unit were purchased in the project or in an existing building elsewhere in the City, any impact on hotel occupancy and hotel tax revenues would be the same. If corporations were to increasingly buy units for their employees, hotel patronage and hotel tax revenues might drop. However, hotel patronage and revenues are dependent upon a variety of factors and there is no reliable data from which to isolate impacts of corporate purchase of condominiums. To date, the project sponsor has received ten inquiries regarding condominium purchases, all from private individuals.

According to the Department of City Planning report "Condominium Research Preliminary Progress Report" (December 1981), 54% of new condominiums that received tentative and final map approval since January 1, 1979 are unsold. Only 20% of condominiums priced higher than \$250,000 have been sold, in comparison with 67% of those priced below \$75,000. These unsold percentages suggest that demand for these types of units has not kept pace with the supply. Not only may some of these units be overpriced, but high mortgage interest rates and an uncertain economy also contribute to the growth of this unsold housing stock figure. Forty-one percent of condominium purchasers have claimed a homeowner's tax exemption, indicating "that the majority of condominiums have been sold to investors, buyers of second homes, or homeowners neglecting to file exemption forms." This latter possibility seems very likely since only 41% of moderate- and lower-priced unit purchasers claimed the exemption. Presumably, low- and moderate-income purchasers would not be investors or buyers of second houses. According to the report, 515 condominium units were unsold, of a total of 1100 units.

As stated on paragraph two on p. 28 of the DEIR, a "Conditional Use authorization would be required by the Interim Controls to permit the use of bonus floor area for residential use on the site." The Interim Controls permit floor area bonuses, "for hotel and residential development which supplies needed new dwelling units and serves to relieve the market pressures which have fostered the conversion of existing dwelling units to hotel use." Section 303(c) of the City Planning Code notes that the City Planning Commission may approve a Conditional Use application if it finds

that "the proposed use...will provide a development that is necessary or desirable for, and compatible with, the neighborhood or the community...."

#### COMMENTS

"The Montgomery-Washington DEIR should include the same or similar information provided in Tables 5a, 5b, and 5c of the Spear and Main DEIR [EE80.349]. In particular, the employee survey for 601 Montgomery St. referenced on p. 75 of the Washington-Montgomery DEIR should be displayed in a format such as said Table 5a; and for all such tables as Table 5a enough numerical information should be provided so that percentages can be readily converted to numbers of persons by the reader. Said Table 5c should include in footnote 1 the percentage of household income presumed to be to spent as a maximum on rental and purchase housing costs, respectively." (John Elberling)

"Using the information provided in the Setting section, the impact of the project's on-site and "secondary" employment on the housing demand of all Bay Counties needs to be stated by price segments of the housing market and by type (rental or condo-sale) to the extent possible. E.g., x% can afford housing in range \$a-\$b; y% in range Sc-Sd, etc., using accepted U.S. DHUD standards of low/moderate/middle/upper income households to identify at least four such ranges. Those households whose income is insufficient to afford unsubsidized for sale housing should be identified as the percentage of on-site and "secondary" demand impact on the rental housing markets of the respective counties." (John Elberling)

"Comparable mitigations for housing impacts, on the same basis of computation as said No. 10, need to be stated for that portion of housing demand generated by on-site employees in other Bay Area counties besides San Francisco." (John Elberling)

"Specific additional mitigation for that segment of the housing demand generated by on-site employees for rental housing, as identified in the Impacts section as per above, needs to be stated, as well as specific mitigation (with partial overlap) for that portion of such demand in the low/moderate/middle-income household affordable segments of the housing market which cannot be accomodated by unsubsidized housing production." (John Elberling)

"All housing impacts...attributable to the project's "secondary" employment impact, and not the subject of any specific mitigation measures, must necessarily be identified as unavoidable adverse impacts also on a county-by-county basis and in the categories noted above." (John Elberling)

"Whether located in the Setting or Impact sections, the amount of "secondary" permanent employment, and its corresponding estimate of housing demand thereby generated, needs to be identified in the DEIR. Moreover...it cannot be assumed that the distribution of such 'secondary' employees' residences will be the same as for the project on-site employees." (John Elberling)

"On p. 74, housing, discussed the multiplier effects on housing, another dread issue. And when you're looking at the impacts, look at it relative to one year's housing growth, not five years...." (Sue Hestor)

## X. Summary of Comments and Responses

"There is no real discussion of cumulative housing impacts....This project is very narrowly focused on housing on the site because of the kind of project that it is." (Sue Hestor)

"On p. 201, the table on housing impacts, the entire last column needs to be looked at. It seems incorrect -- it is not clear where the numbers come from. The presentation understates project demand by comparing it to five years worth of housing growth....It neglects to show impact of cumulative demand versus housing stock growth." (Sue Hestor)

"When you talk about the impact of this project there are 210 units of direct demand which is 13 to 21 percent of one year's (housing) production (in San Francisco). Also, when you compare the data on p. 74, it's inconsistent with the last column on p. 201 on housing." (Sue Hestor)

### RESPONSE

The data contained in Table 5a of the Spear and Main DEIR is based on a 1974 SPUR survey (updated information will be available when the 1980 census is published and the Downtown EIR is completed). Rather than inflate 1974 income levels to 1981, a tenant survey of a building comparable to the project was made. As noted in the second full paragraph on p. 75 of the DEIR, the 601 Montgomery St. building is located adjacent to the project site, is similar to the project's square-footage, and is managed by the project sponsor.

The average monthly rental prices appearing in Table 5b of Spear and Main are based on a survey of newspaper advertisements. These surveyed units represent a very small segment of the City's housing stock. Furthermore, such a survey does not reflect the true median cost of housing in the City, but only the price of units coming into the market. Based on preliminary data from the 1980 census (a 100% sample), the median rent in San Francisco was \$266 in April 1980 ("Selected Housing Characteristics by States and Counties: 1980," issued October, 1981). The median value of owner-occupied dwellings was \$103,900. The preliminary data available from the Census does not break down cost by size of units. The median number of rooms of all housing units in San Francisco was 4.0.

By applying The Consumer Price Index increase of 15.4% between April 1980 and October 1981 (U.S. Bureau of Labor Statistics) to the \$266 median rent, a 1981 median rent of \$307 results. Allowing 35% of an individual's income for housing, a household would have to earn \$10,526 to afford such a unit. Since the median salary for a typist is about \$10,900, even one of the lowest-paid groups of office employees (U.S. Department of Labor, "Area Wage Survey, San Francisco - Oakland," March, 1981) would be able to afford market rate rental housing. According to the "Report of the Citizen's Housing Task Force" (July 29, 1981), rent levels in San Francisco have not kept pace with the cost of apartment construction. The monthly market rent for a new studio apartment given typical construction cost was \$690 in 1980. An income of about \$23,000 would be required to afford rental of such a unit. Lower-paid office workers would not be able to afford new rental housing units based on current construction costs; most would be expected to live in existing rental housing.

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The 1980 median owner-occupied housing price of \$103,900 inflated by 15.4% yields a 1981 median price of \$119,900. Based on a 20% downpayment and a 30-year mortgage at 18%, monthly payments of \$1,446 would be necessary to afford such a unit. Allowing 35% of income for housing and assuming 1.8 workers per household, an individual earning about \$27,600 could afford such a unit. Were the project to contain a similar distribution of office workers and salary ranges as the surveyed 601 Montgomery St. building, more than half of the project employees could afford to purchase housing in San Francisco.

The approximately 210 housing units that would be demanded in San Francisco as a result of the project (see line 10, the first full paragraph on p. 74 of the DEIR) include both owner-occupied and rental housing. No attempt has been made to distinguish between the two types of demand, based on the information contained in the Department of City Planning memorandum "Housing Requirement for Office Development in San Francisco," because the data base is not adequate to separate demand for rental as opposed to owner-occupied housing.

The Memorandum "Housing Requirement for Office Development in San Francisco", July 1981, used to estimate housing demand is applicable only in San Francisco. It has no adopted basis in any of the surrounding counties. The City Planning Commission does not have the legal authority to impose mitigation measures outside its jurisdiction. As shown in Table C-2 in Appendix C on p. 268, the project-generated housing demand would comprise between 0.1% to 0.2% of the housing growth over the five year period from 1980-1985 in the Peninsula, East Bay and North Bay, if it were assumed that all jobs created by the proposed project were to generate new households in the Bay Area, a worst-case assumption.

The Input-Output Model used to project secondary employment due to the project (see footnote /1/, p. 81 of the DEIR) is based on the regional economy. As the locations of these jobs cannot be projected, neither can the residential distribution of secondary job holders. A reliable model of the distribution of such secondary effects is not known to the DEIR authors. It is reasonable to conclude, however, that secondary employment would effect the Bay Area housing market. The following has been added to the end of the second full paragraph on p. 74 of the DEIR: "Secondary employment attributable to the project would tend to increase housing demand levels above those directly attributable to the project. However, due to uncertainties in projecting distributions of secondary job sites and residential patterns, the distribution and magnitude of secondary housing demands in the City and the remainder of the region can not be reliably quantified."

The analysis of housing in pp. 73 to 76 of the DEIR does not consider the housing requirements of secondary employment induced by the multiplier effect. Available data cannot be used to make such projections. Page 74 and Table C-2 on p. 268 discuss the housing demands of project employees. The project's impact on the housing market would not be immediate (i.e. one year). The building would be rented to tenants, tenants would hire employees, and employees would make housing decisions, all over a period

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of time. For this reason, a five-year period is considered. The last paragraph on p. 73 continuing to p. 74 states, "By 1985, it is projected that cumulative San Francisco housing demand resulting from Downtown office development will be about 17,000 units. This demand would exceed the projected growth in City housing stock by an estimated 9,000 to 12,000 housing units. This total demand is expected to cause some downtown employees to seek housing in other Bay Area locations." The detailed discussion of this subject contained in Five Fremont Center, Final EIR is incorporated by reference on p. 73 of the DEIR, lines 1-5 of the last paragraph.

On p. 268, the last column was obtained by dividing the number of households generated by the project by the net projected housing stock growth, 1980-1985. The information given on the second full paragraph (lines 1-3) on p. 74 is correct and the last column of Table C-2, p. 268, has been changed, in the row for San Francisco, from "1.1 to 2.0" to "2.5 to 4.0."

### COMMENTS

"The amount of housing produced, net, by size (vs. household size), by type (condominium-sale or rental), and by price range needs to be stated for several recent years, and for each of the Bay Area counties." (John Elberling)

Table C-2, page 201 of the Montgomery-Washington DEIR needs a column with estimates of additional cumulative housing demand by county group not attributable to San Francisco office development, and the overall resulting net excess demand/supply from all sources (see Housing Task Force reports of the various counties)." (John Elberling)

### RESPONSE

Some data on the existing housing stock in the Bay Area is available from the 1980 Census of Housing (U.S. Department of Commerce, "Selected Housing Characteristics by States and Counties: 1980," issued October, 1981), as shown below:

	<u>Median Rooms</u>	<u>Owner-occupied Median Value</u>	<u>Renter-occupied Median Rent</u>
Alameda	4.8	\$ 84,900	\$ 240
Contra Costa	5.4	94,300	266
Marin	5.2	151,000	344
Napa	5.1	78,600	249
San Francisco	4.0	103,900	266
San Mateo	5.0	121,400	311
Santa Clara	5.2	107,700	308
Solano	5.3	66,700	216
Sonoma	5.0	87,600	255

Direct data on the amount of housing produced in the entire Bay Area is not available, but may be inferred from data on building permits (see Table 4A below). The available data from ABAG shown in Table 4A does not

TABLE 4A: BAY AREA HOUSING PRODUCTION, 1978-1980

County Year	Single- Family Permits	Multi- Family Rentals Permits	Multi- Family Condos Permits	Total Multi- Family Permits	Total Permits Issued	Proposed Units
Alameda						
1978	4,052	1,985	480	2,465	6,517	11,592
1979	4,129	1,496	718	2,214	6,343	5,622
1980	2,743	1,038	1,022	2,060	4,803	8,187
Contra Costa						
1978	5,193	1,415	0	1,415	6,608	17,717
1979	5,557	387	388	775	6,332	12,135
1980	4,566	614	240	854	5,420	19,619
Marin						
1978	1,154	679	118	797	1,951	1,242
1979	694	151	25	176	870	2,198
1980	751	92	87	179	930	612
Napa						
1978	627	248	73	321	948	1,642
1979	337	35	0	35	372	654
1980	320	110	0	110	430	399
San Francisco						
1978	227	1,818	0	1,818	2,045	2,214
1979	239	1,394	200	1,594	1,833	1,321
1980	190	549	463	1,012	1,202	4,474
San Mateo						
1978	1,185	1,130	343	1,473	2,658	3,359
1979	1,685	697	185	882	2,567	2,726
1980	1,201	424	682	1,106	2,307	4,680
Santa Clara						
1978	6,999	2,807	214	3,021	10,020	8,478
1979	6,098	1,382	556	1,938	8,036	14,638
1980	5,071	2,627	327	2,954	8,025	9,717
Solano						
1978	3,483	701	137	838	4,321	21,620
1979	2,773	684	61	745	3,518	8,522
1980	1,724	490	64	554	2,278	5,466
Sonoma						
1978	2,456	948	0	948	3,404	3,683
1979	3,069	890	109	999	4,068	2,791
1980	1,779	280	303	583	2,362	2,588

SOURCE: Association of Bay Area Governments, "San Francisco Bay Area Housing Activity Report No. 3," May, 1981.

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include household size and price range information corresponding to the data above.

The "Report of the Citizen's Housing Task Force" (San Francisco, July 29, 1981) projects a need for 30,000 dwelling units in San Francisco between 1980 and 1989. This projection was made using a demographic analysis; no attempt was made to distinguish between demand attributable to office development and demand from other sources. As shown in Table C-2 (p. 268), the demand for housing of 17,200 units between 1979 and 1985 attributable to office development will exceed the projected growth in housing stock of 5,000 to 8,000 units, by about 9,000 to 12,000 units. There will be a demand/supply imbalance in San Francisco.

Probable results include increasing housing costs in the City and more people seeking housing in other Bay Area Counties. Table C-2 also shows that housing demand attributable to the project in other Bay Area Counties would amount to less than 0.2% of expected growth of housing supply in those counties.

### COMMENTS

"The full discussion referenced in the Montgomery-Washington DEIR first contained in the Five Fremont Center (80.268) should be reprinted in full if it is to be used, and it should be updated with more current information as applicable. EIR readers cannot be expected to have ready access to material on file, and there is no compelling reason not to reproduce that eight-page section for the subject DEIR." (John Elberling)

"Page 73, you need data in this EIR on the income levels of the workers. I don't think references to other EIR's are good enough....Incorporations by reference of major bases of data in terms of income levels of workers and other housing questions should be in this EIR to put you on notice about what it is you are talking about when the project comes before you. And massive incorporations by reference aren't good enough. If they think it's going to weigh down the text, let them put it in the appendix. But put it in the same volume." (Sue Hestor)

### RESPONSE

According to the State EIR Guidelines (California Administrative Code Title 14), Section 15149, "An EIR may incorporate by reference all portions of another document which is a matter of public record or is generally available to the public." Section 15016(s) encourages public agencies to reduce paperwork by, among other things, "using incorporation by reference." On p. 73, paragraph five of the DEIR, the information contained in Five Fremont Center, Final EIR is briefly summarized. Line three of that same paragraph states, "This document is available for public review at the Department of City Planning, Office of Environmental Review, 45 Hyde St., Room 319, and is hereby incorporated by reference into this EIR."

Muni, BART, and Regional Transit

COMMENT

"In terms of the Muni fiscal analysis on p. 78, you're using bad data again. You are using the subsidy per rider approach,...I mean, they come up with a cost of \$50,000 for the Muni? Even using figures on an average cost per new run from the 1979 data, and that's conservative, you have at least a cost of \$160,000. I think you need to talk to Muni and get better figures." (Sue Hestor)

"Page 78, Can costs of Muni now be determined (alternatively to this method) by methodology used in new data from P.U.C. [Public Utilities Commission] or transit assessment district, which shows downtown area carrying larger proportions of service and costs and benefits?" (Toby Rosenblatt)

RESPONSE

According to Bruce Bernhard, Muni Chief Accountant (telephone communication, December 28, 1981), the marginal capital and operating cost per peak period Muni ride is \$0.71 (marginal costs represent the costs per additional peak period passenger trip above existing ridership). As average fare revenue per trip is \$0.32, Muni requires a subsidy of \$0.39 for each additional ride generated by downtown development. Part of this \$0.39 per ride deficit is compensated by state and federal subsidies, while the remainder is offset by General Fund contributions. The DEIR uses \$0.39 per ride deficit entirely from General Fund subsidy (see the first full paragraph on p. 78). Thus, the analysis contained in the DEIR may overestimate the need for General Fund subsidy generated by the project if state and federal subsidies continue. The proportion of Muni subsidy financed through the General Fund may increase over the 1981-82 amount in the future, as federal operating subsidies for mass transit are expected to decline.

The data contained in "Transit Assessment District Cost Study" (City and County of San Francisco, Office of the City Attornery, October 1, 1981) was generated to calculate the net deficit of Muni on a per-square-mile basis. The study also contains operating costs per passenger mile and revenue per passenger trip. The total number of downtown passenger trips, however, was not determined for the purposes of the study. According to Bruce Bernhard, Muni Chief Accountant (telephone communication, December 30, 1981), net deficit per passenger trip cannot be calculated using the data as given in the "Cost Study." According to Mr. Bernhard, Muni will develop information based on the study which can be used to evaluate downtown projects, within the next few months.

COMMENT

"On p. 79, the BART deficit increase needs to be addressed better than it is in this EIR. San Francisco residents pay a half-cent BART subsidy on their sales tax as well as...on our property taxes....We...have paid for it historically out of our property taxes as well. This is a cost to City residents. It is also a cost to regional residents." (Sue Hestor)

RESPONSE

Property taxes that would be paid from the project and allocated to BART were omitted from the analysis shown in the first paragraph on p. 79 of the DEIR. The figure "\$100,000" at the end of the first paragraph (line 12) on p. 79 of the DEIR is changed to "\$58,450" and a footnote 19 has been added at the end of the paragraph regarding the deficit to BART generated by the project. Add the following to the footnotes - Employment, Housing and Fiscal Factors on p. 83 of the DEIR:

"/19/ Cost = 965 employees x 15% ride BART x 468 rides per year x \$1.50 cost per ride = \$101,615. Revenue = \$1,072 taxable sales per employee x 965 employees x .005 BART sales tax x .75 (% of tax to BART) = \$3,879, plus \$615,000 property tax revenue generated by the project x 6.389% to BART = \$39,290 Net deficit = \$101,615 - \$3,879 - \$39,290 = \$58,446." BART sales tax revenues are collected in Alameda, Contra Costa and San Francisco Counties.

COMMENT

"Every transit system in this area has a subsidy from area residents apart from state and federal subsidies. What are going to be the increased demands on these transit systems doesn't come through in this EIR, because it's modeled on most of the others. On p. 79 you have to add that impact on the transit agencies." (Sue Hestor)

RESPONSE

A-C Transit, Golden Gate Transit, SAMTRANS and Southern Pacific do not receive subsidies from locally collected taxes. All receive federal and state subsidies. Area residents contribute to these transportation systems through their federal taxes and state gasoline and sales taxes paid in the counties where purchases are made. Transit impacts on these regional carriers are discussed in the DEIR on pp. 91-93.

Net Fiscal Impact

COMMENT

"On p. 79, 'The project would probably have an initial fiscal benefit.' What is the benefit? There is no proof. What it should say is: 'It is not known whether the project would be beneficial fiscally initially to the City. However, in the long run it would probably be fiscally disadvantageous. You have the basis for that statement in all previous EIR's as well as Sedway/Cooke and in all of the studies that factor in the turnover rate post-Prop. 13 of commercial office buildings.'" (Sue Hestor)

RESPONSE

A detailed discussion of initial and long-term fiscal impacts of developments appears in the 101 Montgomery Street Final EIR, EE 80.26, pp. 309-326, which is incorporated by reference into the Montgomery-Washington Building Draft EIR on p. 79, paragraph two. These

findings are briefly summarized on p. 79. New developments generate more revenue than do existing buildings on a per-square-foot basis for the City and approximately the same costs. Thus, (DEIR, p. 79, paragraph three), "The project would probably have an initial fiscal benefit. Because revenues to the City would probably increase at a slower rate than costs, due to Proposition 13 limitations on property tax increases, there would be a time when cumulative costs of providing services to currently proposed and approved development would be higher than revenues provided (assuming no new revenue sources are found and the rate of new development declines)."

#### Fiscal Studies

##### COMMENT

"Also on pp. 79 and 80, when you are looking at the various studies, we would find it more helpful if you told who was paying for the Gruen and Gruen Study, who was paying for the Arthur Andersen Study, who was paying for the Sedway/Cooke Study, because the biases are inherent in who is paying for them." (Sue Hestor)

##### RESPONSE

Add the following sentences to the end of paragraph two on p. 79 of the DEIR:

"The Gruen Gruen + Associates and Arthur Anderson studies were paid for by the San Francisco Chamber of Commerce. The Sedway/Cooke study was paid for by the City and County of San Francisco. The David Jones Study was prepared under the auspices of San Franciscans for Reasonable Growth. The Recht Hausrath & Associates Study was paid for by Environmental Science Associates under contract to the project sponsor for the 101 Montgomery St. Building and reviewed by the Department of City Planning."

#### Transportation, Circulation and Parking

##### Construction Traffic

##### COMMENTS

"It is noted in the Impact Chapter on page 83, that during construction, congestion may occur. Access must be maintained at all times to the Holiday Inn's loading docks and garage entrances on Washington Street. The hotel houses approximately 1,000 people at all times....If the parking lane is closed for a pedestrian walkway and construction vehicles are standing in the next traffic lane, congestion will occur and access to the hotel will be impeded. Consideration should be made for using Merchant Street for all construction vehicles and materials, rather than Washington Street which is a major freeway connector to downtown San Francisco." (Harold L. Moose, Jr.)

## X. Summary of Comments and Responses

"In terms of p. 83, construction impacts...those construction barricades and taking traffic lanes on places where there's either a lot of traffic coming off the freeway or a lot of transit routes creates real messes. And we are heading into one of those again on this project. When I read p. 83, demolition, excavation and construction, it worries me. I think you need a much better statement of how tying up the street, tying up the traffic lanes, are going to impact in the morning when people try and come off the Washington Street ramp and try and get down into the Financial District. Because there's going to be traffic lanes lost, because parking lanes are traffic lanes in downtown because there are towaway zones on them." (Sue Hestor)

"Additionally, Washington St. at Montgomery becomes...narrow....It is not unusual when you're going up Washington St. to go to Chinatown to have traffic backed all the way down the hill, a lot of times from Kearny St., from Stockton St. all the way down....Washington St. comes from being a freeway off ramp...and every block, it narrows down some more. So you have a problem on this block because there's traffic already funnelling down. You have people going into that [the Holiday Inn] garage. I think you need a better analysis of the traffic impacts because of the construction, let alone people coming to the site once it's opened." (Sue Hestor)

### RESPONSE

The main site access during construction would be from Montgomery St. Merchant St. would not be used due to the lack of maneuvering room for construction vehicles. Washington St. would not be used as an access point due to constraints in locating the hoisting towers and other construction equipment which would be along the Washington St. frontage. The Holiday Inn garage entrance and loading docks would not be blocked. Traffic delays would occur on Montgomery St. as trucks (an average 12 per day, with a maximum of 40, as noted in paragraph one on p. 83 of the DEIR) are maneuvered to enter the site. The curb lane on Montgomery St. is used for loading during non-peak hours; this use, for routine loading, would be eliminated during the construction period. During peak hours when the lane is normally available for traffic use (tow-away zone) the projection of the covered sidewalk into the curb lane would eliminate a traffic lane. Curbside parking on Washington St. now occupies the curb lane. Installation of a covered sidewalk would not result in the loss of a traffic lane on Washington St. Delete the fourth and fifth sentences (line 5 to middle of line 9) in the last paragraph on p. 83 of the DEIR and replace with the following: "The parking lane on Washington St. and probably the loading zone on Montgomery St., which is a traffic lane during peak hours, would be closed during construction to allow pedestrian travel under covered walkways in the streets. The elimination of the peak-hour traffic lane on Montgomery St. would result in approximately a 25% reduction of capacity on this street, contributing to congestion. If it were assumed that the loss of a peak-hour traffic lane on Montgomery St. would effectively eliminate an intersection approach lane on Columbus Ave., a worst-case assumption, the volume-to-capacity ratio at the intersection of Montgomery and Washington Sts. with Columbus Ave., would increase from 0.81 (see Table 7, p. 86) to about 0.90. This would represent Level of Service D/E; operating conditions at this intersection would approach capacity during the construction period. (See Appendix D,

## X. Summary of Comments and Responses

Table D-1, p. 269 for definitions and volume/capacity ratios for each vehicular Level of Service.) If it were assumed that the entire curb lane on Montgomery St., between Washington and Clay Sts., would be lost during construction, the volume-to-capacity ratio at the intersection of Montgomery and Clay Sts. would increase from 0.72 to about 0.82 (a change from Level of Service C to D). As construction activities would only eliminate a peak-hour traffic lane from Washington to Merchant Sts., the actual increase in the volume-to-capacity ratio at the intersection of Montgomery and Clay Sts would be less."

### Traffic

#### COMMENTS

"In terms of p. 40, the setting on the streets, you need to describe existing freeway congestion and levels of service. The congestion is pretty severe during rush hour...traffic is already...pretty heavy right at the site at night, and in the morning because of the freeway". (Sue Hestor)

"On Page 85, vehicular impacts, you don't mention cumulative impacts on freeway there." (Sue Hestor)

"We believe the project-generated traffic will add to existing AM and PM peak-period congestion on State Routes approaching and within San Francisco." (Paul H. Hughes)

#### RESPONSE

Existing peak-hour conditions on Washington, Clay, Montgomery, and Sansome Sts., which serve the project as feeders to or from freeway ramps, are described on p. 85 of the DEIR. Tables 7 and 8 on pp. 86 and 88 of the DEIR compare existing volume-to-capacity and Level-of-Service information on freeway feeder streets with projected traffic conditions in 1984. Table 8 considers both cumulative development and vehicle impacts due to the project. As noted in paragraph two on p. 86 of the DEIR, "The Department of City Planning has initiated an analysis of the cumulative traffic impact of 29 buildings in the vicinity of the proposed project....The 1984 base traffic volumes, exclusive of the project volumes...were projected by analyzing the traffic increases from these 29 buildings as well as the traffic from other developments," for comparison with post-project conditions.

The most congested of the freeways which would receive traffic from the project are I-80 on the Bay Bridge, the James Lick Skyway, and U.S. 101 south of the Central Skyway. These roadways would be cumulatively affected by the projects listed in Table D-8 on p. 275 and by other future development downtown. It is not possible to accurately project future operating conditions on these freeways; Levels of Service may be affected by design improvements and/or changes in the freeway system, transportation policies of City and regional agencies, and cumulative traffic growth in the Bay Area, in addition to development in downtown San Francisco.

## X. Summary of Comments and Responses

Revise the third sentence (lines 6-8) in paragraph two on p. 87 of the DEIR to read, "The impact of the project would be an imperceptible lessening of the Level of Service of traffic operation on the City street and regional highway systems."

### Transit

#### COMMENTS

"On p. 92, the transit impacts. What are the base figures before cumulative impacts? They are missing." (Sue Hestor)

"pg 93 - I assume that footnote about Muni data also means that analysis possible only, or done only, on individual lines rather than system wide, like the others. If so, reference to page 210 would be appropriate here." (President Rosenblatt)

"page 210 & page 93 - Under discussion of and data about Muni capacity - what expansion from current system is assumed? What funding is necessary to accomplish this? If that funding is no longer reasonably certain, what alternatives are possible and what worst case or most probable case impacts would occur from this project and other projects in 1984 cumulative base?" (President Rosenblatt)

#### RESPONSE

The existing riderships and capacities for regional transit carriers are given in Appendix D, Table D-7 p. 274. Existing peak-hour conditions on Muni vehicles are discussed in paragraph two on p. 91 of the DEIR. As noted in paragraph four on p. 91 of the DEIR, "Increased transit ridership from 29 proposed downtown developments was included in the 1984 base values (see Appendix D, Table D-8, p. 275). In addition, growth from other developments not specifically analyzed was considered through the use of a growth factor." Growth factors were based on information gathered from each transit agency. The growth factors derived for the period 1980-1984 were 22% for BART, 0% for A-C transit and Muni, 2.6% for SamTrans, 2.4% for Southern Pacific Railroad and 3.3% for Golden Gate Transit. Worksheets showing the derivations of these percentages are on file with the Department of City Planning, Office of Environmental Review, 45 Hyde St.

Revise footnote \*\*\*\* in Table 9 on p. 93 of the DEIR to read, "Load factors have not been included for the Muni system as a whole due to the lack of reliable data. Load factors for Muni are handled on a line-by-line basis (see also Appendix D, Table D-10, p. 277) rather than system-wide".

The Muni analysis for this DEIR was undertaken following Department of City Planning Guidelines which analyze cumulative and project ridership based on existing capacity. This analysis assumes no expansion in the Muni system and the results are not dependent on increased funding. Any expansion (the Muni 5-year plan) to the system, should it occur, would

## X. Summary of Comments and Responses

likely lower load factors. If funding were to decrease, operating conditions on the Muni could be expected to deteriorate. Many riders might switch to other means of transportation to reach the Downtown; however, it is not possible to determine the shift in transportation mode which could occur. If funding were no longer reasonably certain, possible alternatives include an increase in fares, some type of tax or assessment, or a restructuring of the regional transit system.

### Parking

#### COMMENT

"On p. 88, parking impacts are deceptive. The total project impact is [a] 290 space demand due to office space, plus 62 on-site spaces...which are going to be taken off the market...minus 15 of these spaces allocated to the residential portion of the building, minus 45 existing on-site spaces, So you come up with 288 spaces, not 230 spaces, parking impact." (Sue Hestor)

#### RESPONSE

The daily parking demand which would be generated by the office portion of the project is estimated to be about 290 parking spaces, 240 long-term and 50 short-term. The project would provide 62 parking spaces. As noted in Mitigation Measure 17, on p. 115 of the DEIR, about 40 spaces would be allocated for the residential portion of the building. Delete the last sentence of the first full paragraph on p. 88 of the DEIR and add: "The project would provide 62 parking spaces. About 40 spaces would be for the residential portion of the building. The remaining 22 spaces would be designated as short-term spaces for the commercial portion of the project. The project would eliminate 45 existing parking spaces, a net loss of 23 spaces available for commercial use. The parking demand which would be generated by the office portion of the building, plus the net loss of parking caused by the project would result in an on-site deficit for the project of about 310 spaces."

#### COMMENTS

"On pp. 4 and 5...the summary, you don't discuss parking impacts....This is a particularly stressful area for parking, because there are so many demands converging around Montgomery and Columbus...parking demands from North Beach,...from Broadway,...from Chinatown, as well as...from the office district. And people relate to those districts differently, in terms of whether they take transit or whether they take their cars....Part of it is tourist oriented, Chinatown, for one. And other parts of it is a neighborhood - commercial district, some of which attracts patrons that use their autos". (Sue Hestor)

"This EIR fails to analyze the impact on the need for preferential parking. The first areas of the City...with preferential parking were the areas about three blocks away...the Nob Hill-Russian Hill Gulch...and Telegraph Hill, because those neighborhoods absorb an enormous amount of downtown traffic overflow and parking overflow." (Sue Hestor)

RESPONSE

Add the following sentences after the third sentence in paragraph one on p. 5 of the DEIR; "Demand for short-term parking in the project vicinity presently exceeds the supply. The project would create an on-site parking deficit for the office portion of the building of approximately 310 spaces." As noted in the third full paragraph on p. 89 of the DEIR, parking demand from cumulative development in the downtown could cause several changes in driver behavior. Some drivers might park at greater distances and either use Muni or walk to reach the downtown core. Imbalances in parking demand and supply could encourage the use of car pools and van pools, the creation of satellite parking facilities, and greater use of regional and Muni transit systems.

Preferential parking is initiated by petition of area residents. After a study of the need for preferential parking has been done by the Department of Public Works and a public hearing held, a proposal may be submitted to the Board of Supervisors for consideration for approval. The possibility that such regulation of parking may be instituted in residential areas which presently do not have preferential parking is mentioned in the last paragraph on p. 89 of the DEIR. The following sentence is added to the end of the second paragraph on p. 41 of the DEIR: "Residential areas in the site vicinity, including Nob Hill and Telegraph Hill have preferential parking for residential use." The following sentence is added to the last paragraph on page 89 of the DEIR: "Cumulative development, including the project, might increase demand for preferential parking in residential areas which experience the impacts of overflow of parking from the Financial District."

COMMENTS

"Page 41, again, 2,000 feet ought to be in parentheses, perhaps the number of blocks -- approximate estimate." (Commissioner Bierman)

"On p. 42, the parking location area again. When was it taken? And was it updated to remove from the survey lots that are either approved or to be approved for development?" (Vice President Nakashima)

"The parking problem in that part of the city is severe, and lot of the lots that are down there are being converted to buildings. There's a changing impact on parking. I can tell you one lot you just approved a couple of weeks ago on Pacific St., a couple blocks from this project [Montgomery at Pacific]." (Sue Hestor)

RESPONSE

Insert "(about 5 blocks)" after the phrase "2,000 ft." in the second sentence of the second paragraph on p. 41 of the DEIR which discusses the parking survey conducted for the DEIR.

The parking survey for the project area was conducted on January 20-23, and 26, 1981 and July 20-22, 1981; Figure 15, on p. 42 of the DEIR, which shows parking locations in the survey area, was revised in the fall of

1981 in the course of environmental review for the project. Parking supply is affected by City policies regarding transportation and land use. As new developments are approved on sites now used for parking, the number of parking spaces in the survey area may be expected to decrease. The parking survey done for this EIR demonstrates that there is great demand for and high occupancy of available spaces. These conclusions remain valid with any changes in the actual number of spaces which may have occurred since the survey was completed.

## Pedestrians

### COMMENT

"Page 87, I would like an expansion on...the pedestrian impacts. The street pattern there, where all of the streets converge at the end of Columbus St., makes it a fairly hazardous intersection to try and get across as a pedestrian right now because you have Montgomery St., Columbus...and Washington St....And it mentions that there will be a proportionate increase in pedestrian-auto conflicts, which is a nice way of saying people are going to be hit by cars. I think you need to put it in plain language....Cars coming down Montgomery St. have a very difficult time, because they have to merge onto Montgomery St. with the Columbus [Ave.] traffic, which is the dominant street pattern -- the dominant traffic flow is Columbus to Montgomery, not Montgomery to Montgomery. And I think you need to have that in this EIR because it is an atypical traffic pattern right there. There are conflicts because of it, auto-to-auto conflicts, pedestrian-to-auto conflicts. It means accidents and people hurt." (Sue Hestor)

### RESPONSE

Auto-auto conflicts and pedestrian-auto conflicts do not refer to collisions or accidents. These terms refer to conflicts or restrictions in the freedom of movement. For example pedestrian-auto conflicts refer to either pedestrian flows blocking the path of automobiles and impeding the movement of the auto, or for autos blocking or impeding the path of pedestrians. The intersections of Montgomery and Washington Sts. with Columbus Ave. and Montgomery and Clay Sts. have designated crosswalks and signalized crossings for the protection of pedestrians. Accidents involving pedestrians may or may not increase at these locations due to increased volumes of vehicular and pedestrian traffic. It is not possible to quantify this effect.

## Off-Street Loading

### COMMENT

"The Draft EIR states on page 90 that semi-trailer trucks would not be able to use the off-street loading bays inside the proposed project, and would be expected to unload from the street. This is an unacceptable situation with severe environmental impacts. Such loading from Washington Street would likely occur from the traffic lane (not the parking lane) due to illegally

parked cars in the loading zone and parked cars at meters. This would create severe congestion on this important westbound artery. Furthermore, the Draft states that project demand would be for four loading docks, not two as provided, thereby increasing the likelihood of congestion and blockage of access to the Hotel. The parking garage for the proposed building should be redesigned to ensure proper off-street loading." (Harold L. Moose, Jr.)

"In the Significant Effects Chapter...street congestion due to inadequate off-street loading spaces [should be discussed]." (Harold L. Moose, Jr.)

#### RESPONSE

As stated in paragraph three on p. 90 of the DEIR, project demand would be for about four loading spaces. The project would provide two off-street loading spaces in conformance with the requirements of the City Planning Code. The DEIR states (paragraph three, p. 90) that, "the existing loading zones on the Montgomery St. frontage would be able to handle the excess demand." The designated loading zone on Montgomery St. would be the loading zone for the project if the off-street loading spaces were not sufficient. Loading from Merchant St. is unlikely, due to the lack of a street-level building entrance there. Loading from Washington St. might occur illegally, regardless of the availability of space in the loading dock or the Montgomery St. loading zone. Double parking by loading vehicles could result in some lessening of levels of service for traffic at the intersection of Montgomery and Washington Sts. with Columbus Ave. The impact would last as long as the vehicle were double-parked, and it is impossible to calculate with certainty the probability of occurrence or duration. The frequency of cars parked illegally in the loading zone, causing double parking by trucks, is a police enforcement matter. As noted on p. 117 of the DEIR, under MEASURES REJECTED 27 and 28, the provision of loading facilities to accommodate semi-trailers and the provision of four off-street loading spaces have been rejected by the project sponsor due to the configuration of the proposed parking facility and to lack of space. The Planning Commission could require these as a condition of project approval.

#### Cumulative Air Quality

##### COMMENT

"I was studying this several years ago, and at that time the Air Resources Board was concerned that cumulative air quality impacts were not being considered. It is disturbing to see that eight or nine years later, I feel it's still not being considered." (Sue Smith)

##### RESPONSE

Cumulative air quality is addressed in the DEIR (see Table 12, p. 97, Projected Local Roadside Carbon Monoxide Impacts). The 1984 Base conditions indicated in column 3 of Table 12 includes cumulative Downtown development (the approved and proposed projects included in the traffic

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study as shown in Table D-8 on p. 275) as well as a 0.2% non-analyzed growth.

### Construction Noise

#### COMMENTS:

"Regarding construction noise on page 99, the Draft states that although the hotel wall facing the site is concrete, noise levels within the hotel would reach 46 dBA during construction. This is not a high noise level and would not interfere with sleep. Presently, noise levels in adjacent building are about 45 dBA. Noise levels in the adjacent 601 Montgomery Building can be expected to reach 65 dBA during construction. (Harold L. Moose, Jr.)

"These seem like very optimistic projections for the hotel and it is likely that noise levels will approximate those in the adjacent structures during construction. While sound may have some difficulty penetrating concrete walls, it will have no trouble entering the windows of the adjacent hotel rooms. This will be especially true where portions of the proposed structure project out further north and south than the vertical plane of the hotel. At these locations there will be no intervening concrete walls and noise impacts will be severe." (Harold L. Moose, Jr.)

"In the Significant Effects Chapter, the noise impacts on the hotel rooms should be discussed..." (Harold L. Moose, Jr.)

#### RESPONSE

Replace the second and third sentences in the fourth paragraph on p. 99 of the DEIR with the following: "Although the hotel wall facing the site is constructed of at least one-ft.-thick concrete, the hotel rooms nearest the project site would be subjected to interior noise levels of about 65 dBA during periods of excavation and exterior finishing (a total of about 10 months). Noise at this level would interfere with speech and sleep."

Add the following sentence to paragraph I. Construction Noise, at the bottom of p. 125 of the DEIR: "Interior noise levels in Holiday Inn guest rooms nearest the project site would reach about 65 dBA during periods of excavation and exterior finishing (about 10 months); noise at this level would interfere with speech and sleep."

### Energy

#### COMMENTS

"I'd like to start with energy on page 21. Since there are only two small buildings there...they shouldn't say the energy use per square foot of floor area would be less than at present, because we are going from a 300-ft. building compared to two small structures. So that's probably not a very good description of the additional energy use. (Sue Smith)

"They do refer to Title 24 of the California Administrative Code. I'd like to urge the Commission to begin to think about what has actually been achieved in energy conservation. The 505 Sansome building...they are beginning to see some data, at least from some of the tenants: the energy use is 30 percent less than Title 24, because that building was designed by engineers who set out to achieve energy conservation....But I would urge you to begin to look at developers with an idea of asking them to meet new standards, not old standards....The new State Building in Sacramento has now been operating for six months, and it's achieving very remarkable savings. So, I would urge that with every highrise construction projection, Title 24 is passe." (Sue Smith)

#### RESPONSE

Energy use per square foot is not the same as total or additional energy use in a building or site. Annual energy consumption is the sum of all energy inputs for a year. The annual energy consumption divided by the gross square footage of the building is the energy consumption per square foot. New buildings are designed with higher standards of insulation, more efficient mechanical systems, and lower lighting levels using more efficient fixtures than were buildings designed before 1975. The proposed structure would meet current design standards and, therefore, as stated on p. 45 of the DEIR, "The existing structures were built before present State energy standards and are probably less energy efficient, on a per sq. ft., basis than modern structures built to current standards." It is not stated that total annual energy use of the proposed structure would be less than that of existing structures.

The State of California sets energy conservation standards for building performance in Title 24, and the project sponsor, his architects and engineers are required by law to comply with Title 24. They are, of course, free and encouraged to improve on the standards. The sponsor also has an economic interest in doing so, because the cost of energy is an on-going operating expense. Energy efficient design of buildings and building systems is an evolving area as indicated by the comment above.

The second full paragraph on p. 101 of the DEIR details project features that would be included to make the proposed project energy efficient. The reclamation of waste heat from the office portion and reuse for the condominiums is expected to result in approximately a 30% savings in pool heating, a 60% savings in condominium space heating and a 95% savings in domestic water heating over that which would be required if waste heat were not reclaimed and reused. (Kevin Cox, Architect, Kaplan/McLaughlin/Diaz, written communication, December 21, 1981.) Also, as indicated on page 103, lines 4-7, the building would use 11 cubic feet of natural gas per sq. ft. per year less than the estimated 26 cubic feet per sq. ft. per year average for recently proposed high-rise buildings in San Francisco. Revising Title 24 requirements to meet current design capabilities is a matter for the State Legislature.

Growth Inducement

COMMENT

"On p. 72, regarding secondary growth, how many of the secondary jobs would be in San Francisco? What would be the housing, parking and transit impacts associated with them? We have these multiplier effects that come in when you are talking about revenues, but somehow multiplier effects are skipped when you are talking about impacts." (Sue Hestor)

RESPONSE

The multiplier effect is generally used to determine Bay Area regional economic gains, particularly in terms of secondary employment. Secondary employment resulting from the project would increase housing demand above that directly caused by the project. Vehicle traffic and transit use generated by secondary employment would increase air quality emissions and transportation impacts above those directly attributable to the project. Due to the uncertainties in projecting employers, residential locations, and transportation patterns of job holders employed throughout the region as a result of the multiplier effect, the magnitudes of these increases cannot be reliably quantified.

Community Services

COMMENT

"CEQA requires you to analyze impacts of each individual project that comes before you and the end cumulative impacts of multiple projects on various city services. And among those services are the schools. And among the services that the schools provide are child care services.

"There is, once again, nothing in...this EIR...We need to have...now that we've admitted that there are employees that need housing, we have to assume that some of those employees are going to bear children. And we have to also assume that even if it's affordable housing, both people that are parents have to work in order to even afford what is called affordable.

"We need to have to analysis in (this) EIR...what the impacts are on the children in the school system.

"Now, there are other kinds of child care services that can be provided outside the school district. We know the school district is in desperate straits. If you read last week's Examiner, you understand what that has done to the child care services within the school district. You understand how many parents are waiting, if you read the article. If not, I will include it in testimony that I have made.

"So we need to measure not only child care services as they are applicable to the school district, but alternative ways of providing the child care, if the school district is unable to provide the necessary service.

"There are a variety of ways, and, once again, I urge you as a Commission and I urge you to urge your staff to go to people in this town that have the data now that does not have to be originally created from your staff, go to the Mayor's Committee on Child Care and the folks at Child Care Switchboard, get the data. It will be very easy, then, to include that information in the draft environmental impact reports." (Kay Pachtner. The above comments in this Community Services section were made at the public hearing for the Marathon Development Project, Second and Folsom DEIR, and were requested to be incorporated by reference for this project.)

#### RESPONSE

There are two basic types of licensed child care in San Francisco: family day care (small groups in private homes), and child care centers. There are approximately 376 licensed family day care homes with an enrollment capacity of 1,950 children (there are 1,950 children served at any one time but the total number served is greater). The majority of children in family day care are less than 3 years old.

Child care centers include both private and state-subsidized facilities. There presently are about 200 licensed child care centers in San Francisco with a total service enrollment of approximately 12,000 children. These children range in age from infant and preschool to 14 years old. Private child care centers (non-profit and profit) have a capacity of approximately 4,600 children. Subsidized child care centers have a capacity of approximately 7,200 children. The San Francisco Unified School District is part of this subsidized category and has a capacity for approximately 3,500 children. The School District facilities are primarily for low-income families and the cost paid for the service is determined according to family income levels. Child care centers presently have only 285 infant spaces.

The demand for child care services exceeds the supply, resulting in an undetermined number of unlicensed child care spaces in private homes. Infants, in particular, are usually provided for in private unregulated care centers. In 1980 there were requests for infant care services for approximately 3,600 children, 1,440 of which were less than 7 months old. Approximately one-third of all parents seeking child care do not find any services. Of the remaining two-thirds who do find care, many are not happy with the services or must use unregulated care.

Due to a backlog in the licensing of child care facilities and lack of funding the supply of child care services has remained relatively constant while the demand has been increasing because of new parents or parents re-entering the labor force. Recently, an increase in requests for child care services has been coming from Downtown employees. While most parents still want neighborhood-based child care centers, an estimated 25% would prefer centers near or at work. (The above information was provided by Merle Lawrence of the Children's Council of San Francisco, a non-profit organization.)

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While the proposed project would provide jobs for San Francisco residents, the number and location of employees needing child care services cannot be reliably quantified.

### COMMENT

"I think it's time that you put in an EIR a reflection of the system capacity of our water system downtown. I'm concerned that maybe the EIRs have been really glossing over the ability of the city's sewage system and the ability of the city's water system to meet the demands. With all of that construction downtown, you are increasing the risk of accidental damage to the mains, as well as you are increasing the risk that stresses, because of so many projects coming on, will cause collapse. What are the possibilities in terms of increasing stresses that cause collapse of the water system and what does that mean downtown?" (Sue Hestor)

"And you need to put that analysis in an EIR. Because all of the sewer plants at the other end of the line aren't going to help if we are putting too many demands and putting too many chances of accidental rupture of the system on a fairly antiquated system,...And also what problems does that possibly create for the city's ability to deal with an earthquake. Because the most important system in an earthquake in San Francisco is a good water system for fire damage. And are we going to be able to put those kinds of stresses on the system and be able to deal with a massive fire." (Sue Hestor. This comment and the one preceeding were made at the public hearing for the Marathon Development Project, Second and Folsom DEIR and were requested to be incorporated by reference for this project.)

### RESPONSE

Potential damage to the water system during building construction could occur from settlement of streets (inadequate shoring) or from the use of heavy equipment (e.g. cranes) for periods of time on the street above water mains. Such placement of heavy equipment on streets would not occur in the construction of the proposed project. Add the following mitigation measure to p. 123 of the DEIR under J. Utilities and Public Services as item 62, MEASURE UNDER CONSIDERATION: "62. Prior to construction, the project sponsor would instruct the general contractor to install markers and to monitor street settlement to ensure protection of the water mains; this action would take place in coordination with the Department of Public Works." According the Eugene Kelleher, General Manager and Chief Engineer, San Francisco Water Department (oral communication January 5, 1982), the additional flows carried by the system as a result of cumulative development would not add additional stresses on the mains and would not increase the probability of rupture. The main break which occurred on December 15, 1981 at Sansome and Bush Sts. was the result of previous work in the streets by other utilities. At that time the pipe was fractured and then ruptured at a later date. The only potential problem to the water distribution system presented by cumulative development is that of capacity. Capacity of water mains is dealt with on a project specific basis. On p. 233, second full paragraph, it is stated, "Existing mains have sufficient capacity and pressure to handle the additional flow demand with hook-up from Montgomery St." Should

insufficient capacity be evident (as determined by the Fire Department) an increase of the system capacity would be required at the expense of the project sponsor.

The City of San Francisco's wastewater is collected by a combined sewer system. This combined sewer system carries storm flows as well as dry-weather flows. Storm flows are many times greater than dry-weather flows. Sewers must be designed to carry storm flows and therefore they could carry many times the volume of sewage produced by City buildings. Page 157 of the Final EIR/EIS San Francisco Wastewater Master Plan, May 1974 (D - EPA - 24003 - CA, SCH 740408/6) states, "Population projections of the City Planning Department were used to develop effluent flow predictions and project loading factors for the Master Plan. The major sizing factor for the system will be wet-weather flows, which are many times larger than dry-weather flows. Consequently, there will be added capacity in the system to treat dry weather wastewaters in excess of those projected."

COMMENT

"I would also like you to analyze, because it really did happen, we really did have a PCB spill, what are the implications of that kind of stress, of that kind of rupture, on the high pressure gas lines that we have downtown, and possibilities of contamination from PCB or...what else is in there. I think those really have happened." (Sue Hestor)

RESPONSE

The PCB spill which occurred at a project construction site at Washington and Battery Sts. was due to construction in an area of high-pressure, natural gas pipes. If, prior to construction, the location of high-pressure natural gas lines are well-marked and construction is then monitored to prevent construction activity in these areas, it is unlikely that such a PCB spill would be repeated. The probability of a reoccurrence of such an accident is difficult to reliably quantify.

Add the following Mitigation Measure to p. 123 of the DEIR under J. Utilities and Public Services as item 63, MEASURE UNDER CONSIDERATION: "63. Prior to construction, the general contractor would meet with PG&E officials to document the location of high-pressure natural gas lines. The general contractor would assume the responsibility of insuring that construction activities would be prohibited from the proximity of these pipes." Monitoring of construction activities in and/or under streets (where high-pressure gas lines are located) is the responsibility of the Department of Public Works.

COMMENT

"In terms of garbage,...that you...have...a quotation from...Golden Gate Disposal that,...[they] can pick up how many tons of garbage that is. You need to put in what the cumulative impacts are in terms of increased demand for land fill that isn't available, and for the trash burner which is a controversial project." (Sue Hestor)

RESPONSE

Disposal of municipal solid wastes presently occurs at a landfill site in Mountain View. San Francisco's contract with this facility expires in October 1983. The City is currently negotiating with other landfill sites to accept San Francisco's solid waste on an interim basis until a solid waste program is implemented in late 1986. The solid waste program would consist of intensified recycling, a resource recovery project generating electricity from the burning of solid wastes, and landfill disposal of bypass and residue wastes from the resource recovery process. The project and cumulative development are not expected to present problems in solid waste disposal upon implementation of the solid waste program, according to David Cohen, Office of Special Projects for the City and County of San Francisco (oral communication September 20, 1981).

Cultural & Historic Factors

COMMENT

"I was very upset about what happened a block from here when--I think it was--Wells Fargo was doing excavation for their building, they found the body of the ship Niantic, which had great historical value. They held up construction at a cost of something like \$100,000 a day, trying to decide what to do with it. And they weren't able to raise the money to put it in a maritime museum. I am just concerned [about] what's going to happen when we start excavating on this project. And do we have to get a complete construction loan so it's going to cost \$100,000 a day if they find something else?...And if there is a way to separate excavation from the rest of it so that we can preserve some history that may be there." (Commissioner Salazar)

RESPONSE

Mitigation Measure 48, on p.121 of the DEIR, describes what would be done should evidence of cultural or historic artifacts of significance be found during project excavation. The project sponsor has agreed that excavation or construction which might damage discovered cultural resources would be suspended for a maximum of four weeks to permit inspection and retrieval of such resources, if appropriate. This mitigation measure was developed after the discovery of the Niantic at Clay and Sansome Sts. to reduce potential costs of delays in construction.

COMMENT

"Page 121, No. 49, "The project sponsor would install a plaque on the project site to commemorate the history of the Bolton & Marron Building..."And I don't know what that building is...Whatever that's about -- have it clarified." (Commissioner Bierman)

RESPONSE

The Bolton & Barron Building, named for James R. Bolton and William E. Barron, was a three-story brick, stucco and stone structure. The building

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is included in the Historic American Building Survey conducted by the U.S. Department of the Interior. The date of construction is in dispute, but it is believed to have been built before 1854 and possibly as early as 1849. The building was demolished in the late 1950's. The Bolton & Barron Building was surmounted by a heavy, simplified classical cornice and was noted for its unusually thick walls. See also the related Cultural section of the final Initial Study prepared for this project, Appendix A, pages 214-247. Note that after initial research at the Department of City Planning, the building was called the Bolton & Marron Building and is so described in the DEIR. Further research with library of Congress staff shows that the correct name is Bolton & Barron. The references to this structure on p. 121 (second full paragraph), p. 238 (paragraph one), and p. 245 (paragraph two) of the DEIR are corrected to read "Bolton & Barron Building."

### MITIGATION MEASURES

#### COMMENT

"Mitigation Measures which suggest meeting with Holiday Inn management to negotiate arrangements for hotel "daytime sleepers" to be assigned hotel rooms furthest from the construction site is considered to be completely unworkable. Hotel guests generally arrive in tour groups and prefer to stay on one floor together." (Harold L. Moose, Jr.)

#### RESPONSE

Mitigation Measure 32, on p. 118 of the DEIR should be changed to read: "Prior to construction, the project sponsor would meet with Holiday Inn management to negotiate and implement feasible noise abatement measures to reduce noise impacts on hotel rooms. Additional noise control measures, such as limitation on the hours of construction activity, would be arranged, if necessary and as feasible, by the Department of Public Works at the request of the Holiday Inn and adjacent offices."

#### COMMENT

"A Mitigation Measure to reduce the impact on pedestrians who will use Washington Street is the internal link...between the proposed project and the Holiday Inn. This would permit pedestrian flow from the Financial District to the Chinese Culture Center and commercial activities in the Holiday Inn, to Portsmouth Square and Chinatown. The Hotel was built with access doors on its east side for this future connection as required by the Redevelopment Agency in its Portsmouth Pedestrian Corridor Plan." (Harold L. Moose, Jr.)

#### RESPONSE

Paragraph two on p. 94 of the DEIR, notes that the project would increase pedestrian activity on the sidewalks fronting the site; however, no particular impact on pedestrians who would use Washington St. was identified. Mitigation Measure 3 on p. 113 of the DEIR describes proposed pedestrian amenities to improve pedestrian access around the project.

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As noted in paragraph four of the first Response on p. 155, as a condition of project approval, doors were required to be provided on the east side of the Holiday Inn. Although these doors would allow a direct connection between the Holiday Inn and a structure built on the project site, such a connection may not promote pedestrian circulation. Because of the difference in grade between Kearny and Montgomery Sts., the doors on the east side of the Holiday Inn would not align with the ground-floor of the proposed project and direct pedestrian movement would be impeded. If an upper-level, east-west pathway were to be developed between Portsmouth Square and the Financial District, a connection between the project and the Holiday Inn would encourage off-street pedestrian circulation in the Portsmouth Corridor. Such a pathway would require a pedestrian bridge over Montgomery St. and an elevated connection with the Transamerica Pyramid to continue the pathway east of the project. As a condition of project approval, the City Planning Commission could require provision of a direct connection between the doors on the east side of the Holiday Inn and the proposed building.

### COMMENT

"As a Mitigating Measure, the building could be cut back at its north west corner..." (Harold L. Moose, Jr.)

### RESPONSE

An alternative which would be set back from the property line of the project site and preserve views within the Portsmouth Corridor is described as Alternative Four, Reduced Site Alternative, on p. 131-133 of the DEIR.

### COMMENT

"In terms of transit, the developer should commit to the development fee. They should not be allowed to dangle out there with everybody else." You [the City Planning Commission] have the power to require them to do it, because you have the impact and there is an ordinance in place." (Sue Hestor)

### RESPONSE

As noted in Mitigation Measure 11 on p. 114 of the DEIR, "The project sponsor would participate proportionately in whatever legal means is finally adopted by the Board of Supervisors to contribute funds for an established Downtown transit assessment district..." The project sponsor would not commit funds to a Downtown transit assessment district while the issue is in litigation. According to the attorney for the project sponsor, such a commitment would cause the project sponsor to waive legal rights presently available or which may result from court action (William Coblentz, oral communication, January 6, 1981).

### COMMENT

"You have no parking mitigation [worth] anything in this EIR. You really need to deal with them because you are having residential parking in an area, that

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the parking at night is already so difficult on the street; it's not like putting in a condo at Montgomery St. and Market St. where you would have the ability for a visitor to park in a space that wasn't available during the day. There is no parking available in this part of the City at all any time of day, other than maybe between 2:00 and 6:00 [a.m]. And there are very long towaway zones around there. That is a severe parking impact 24 hours a day." (Sue Hestor)

### RESPONSE

As noted in the first partial paragraph on p. 88 of the DEIR, "demand for short-term parking in the area presently exceeds the supply." Mitigation Measure 17, on p. 115 of the DEIR, describes project mitigation of parking impacts for project residents. The project would include about 40 parking spaces for the residential portion of the buildings or 30 spaces more than the residential parking requirement for dwelling units in the C-3-0 District. This would allow one parking space for each condominium unit. The remaining parking spaces, which would be designated as short-term spaces, would be available for visitors to the residential units, particularly at night when parking demand from the office portion of the building would be reduced.

### COMMENT

"With regard to air pollution mitigation on p. 117,...All of your air pollution mitigation is transit and van pooling, and selling Muni fast passes. That is your air pollution mitigation. I think you have the responsibility to say how much that is going to mitigate. How much air is going to be cleaned up by selling fast passes. How much air is going to be cleaned up by van pooling. Versus how many people are going to drive no matter what....On air pollution you have to look at it. How many trees can you plant to clean up the air. I would be glad to have cleaner air in the City. I would love to see air quality mitigations that are air quality mitigations rather than selling fast passes." (Sue Hestor)

### RESPONSE

Selling fast passes and promoting transit use is intended to reduce the amount of automobile use and concomitant vehicular pollutant emissions. Approximately 60% of project-generated trip ends would be accommodated by transit. This represents a potential of 60% reduction in air pollutant emissions over emissions generated if transit did not exist. However, it is not possible to determine the actual number or percentage of people who would use transit as a direct result of the transportation broker. Statistics are also unavailable for determining the actual number of people participating in vanpools.

It should also be noted that actual ambient air pollutant concentrations are expected to decrease as a result of control strategies, including improved emission controls, described in the 1979 Bay Area Air Quality Plan, San Francisco Bay Area, and discussed in the Initial Study for this project (see p. 229-231, Appendix A).

## X. Summary of Comments and Responses

As noted in Mitigation Measure 4 on p. 113 of the DEIR, "the project would include street trees and sidewalk plantings on Montgomery and Washington Sts. Entry plazas, the residential lobby, and the pool area would be landscaped." The proposed trees are intended as a visual amenity. Trees (vegetation) absorb and utilize large quantities of carbon dioxide, not carbon monoxide. The identified processes of removal from the environment of carbon monoxide are destruction in the stratosphere, chemical reactions, and absorption into the soil. (Stern, Arthur C., Air Pollution, third edition, Vol. 1, 1976). Planting trees may have other benefits but would not affect carbon monoxide levels.

### COMMENT

"On p. 112, a mitigation measure, that the sponsor would urge the Board of Supervisors to use part of the proceeds of Lot [25] since when is it a mitigation measure, when the sponsor has no control over what the Supervisors will do?" (Vice President Nakashima)

### RESPONSE

Delete Mitigation Measure 1, p. 112 of the DEIR.

## ALTERNATIVES TO THE PROPOSED PROJECT

### Summary Description

### COMMENT

"The alternatives are very cursory. I would ask, on p. 31, that would be -- there's just a reference to what the FAR's would be, not the height under No. 3 which has six lines. That's an alternative. It's a six-line description. It just refers, doesn't give any specifics as to height whatsoever." (Sue Smith)

### RESPONSE

The above Comment refers to p. 31 of the Final Initial Study for this project (see Appendix A, Item 3 on p. 246). The Final Initial Study simply identifies alternatives under consideration; details of the alternative building designs had not been developed at the time the Final Initial Study was published. The discussion of Alternatives to the proposed project, on pp. 8-10 of the Summary Chapter of the DEIR provides a summary description of project alternatives. These alternatives, themselves, are fully described and analyzed in Section VII, Alternatives to the Proposed Project, pp. 126-139, of the DEIR. The height and FAR of Alternative Three is given in the Alternatives Summary in paragraph one on p. 9 of the DEIR and the full discussion of this alternative appears on pp. 129-131.

Guiding Downtown Development Alternative

COMMENT

"Fig. 32 (facing pg. 137) Could we have some discussion about this alternative and what would be necessary to accomplish it?" (President Rosenblatt)

RESPONSE

Alternative Five: Guiding Downtown Development Alternative, described on p. 134-139 of the DEIR, would conform to the use provisions of the City Planning Code, as stated in paragraph one on p. 139 of the DEIR; the overall FAR of this Alternative would be about 14:1. The City Planning Commission could approve Alternative Five as proposed, without use of the bonus provisions of Section 126 of the City Planning Code and the Interim Controls.

Figure 32, on p. 136 of the DEIR, shows an Alternate Ground Floor Plan, which would provide increased retail space to accommodate a greater number of retail uses than the proposed Ground Floor Plan shown in Figure 4, p. 16 of the DEIR. The Alternate Ground Floor Plan responds to Guiding Downtown Development proposals to promote small-scale retail activity at street level. If included as part of the project as proposed, the Alternate Ground Floor Plan could not permit the amount of bonus floor area requested, as shown herein on Figure 11A and Table 1A, pp. 146 and 147. The requested bonus for sidewalk widening would not be applicable to the Alternate Ground Floor Plan and the Shortened Walking Distance Bonus would be reduced. The total bonus floor area which could be requested with the Alternate Ground Floor Plan would be approximately 38,600 sq. ft., in comparison to 83,700 sq. ft. for the proposed project. The amount of housing floor area which could be provided with the Alternate Ground Floor Plan, if it were substituted in the project for the plan shown in Figure 4, would be 49,500 sq. ft. less than the 88,100 sq. ft. proposed, based on the limitations on the use of floor area bonuses imposed by the Interim Controls. (The number of dwelling units would be reduced to about 15, in comparison to about 40 for the proposed project.)

If the City Planning Code, and possibly the Interim Controls, were modified to permit the provision of housing in excess of requested bonus space, as described in paragraph one on p. 48 of the DEIR, it might be possible to allow both the amount of housing proposed as part of the project and the Alternate Ground Floor Plan.

Reduced Height and Shadow Alternative

COMMENT

"If [the developer] had chosen the new structure next to the one at Montgomery and Washington, the 601 Montgomery is 19 stories. It seems to me that if we were going to have a project that would be tolerable for the City, it would be stepped down, not up, from 601 Montgomery. (Sue Smith)

"The shadow pattern is directly created by the fact that it steps up from 601 Montgomery and does not stop, step down by, say, one floor. And that would spare Jackson Square from five hours of total shade, from about 1:00 o'clock onwards in the midday, in the midwinter period, which is probably a three- or four-month period. (Sue Smith)

"This structure should be viewed as one which steps down from that adjacent building, not stepped up....I would like to urge that a complete environmental review be done on a project which would meet the requirements of Jackson Square, in protecting Jackson Square, and that be presented as probably a new Draft EIR. Because I think this is so in conflict."  
(Sue Smith)

#### RESPONSE

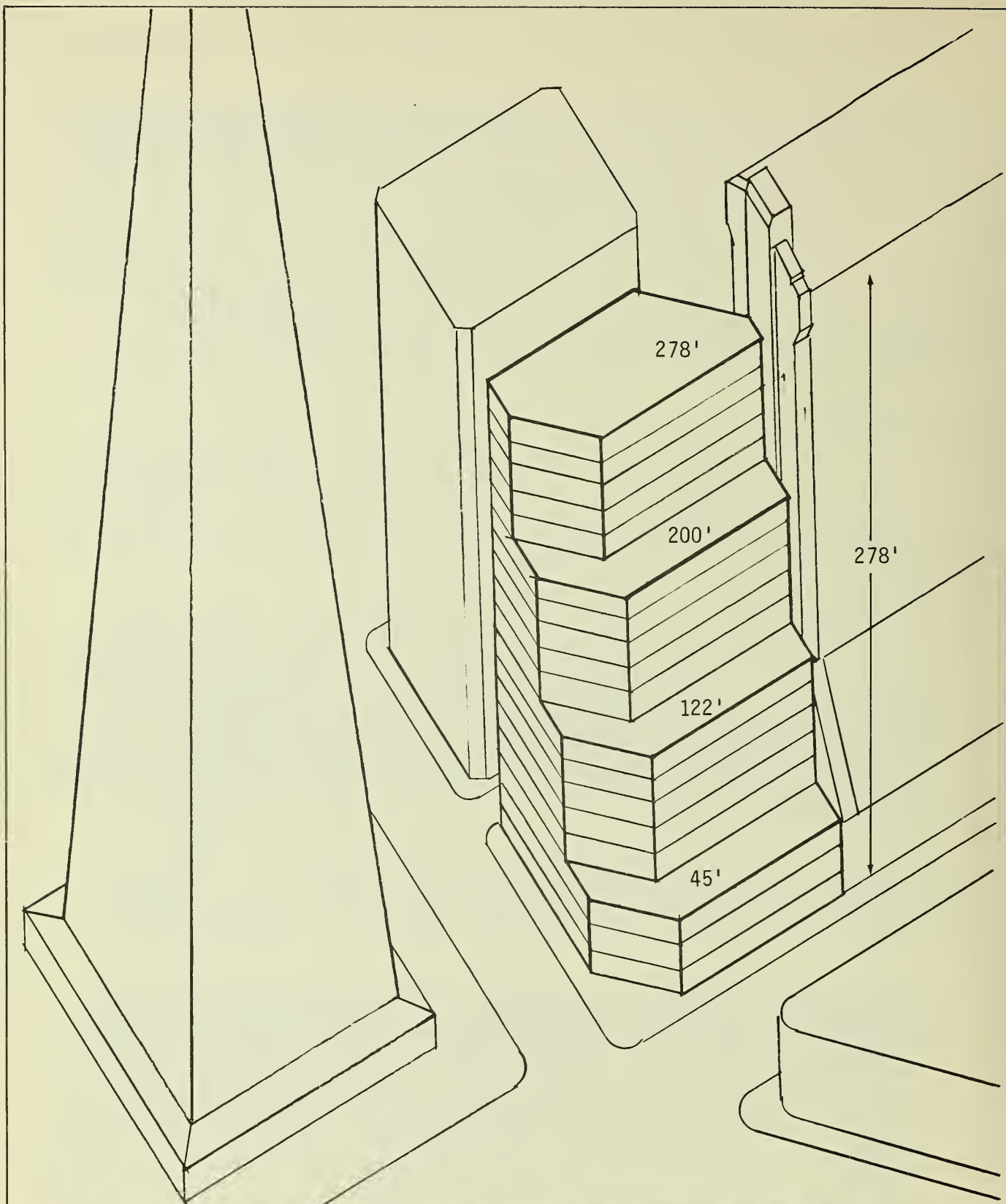
For a discussion of project shadow impacts on the Jackson Square Historic District, see Response on p. 157. The following alternative has been developed in response to identified shadow and urban design impacts of the proposed project. This alternative is added to the DEIR after the second full paragraph on p. 131 of the DEIR.

#### ALTERNATIVE THREE A: STEPPED HEIGHT ALTERNATIVE

This alternative would consist of an office building reaching a maximum height of 278 ft. (see Figure 29A). The building would step down toward Washington St. in a series of three setbacks from the height of the adjacent 280-foot-tall 601 Montgomery St. building. Alternative Three A would contain approximately 243,600 sq. ft. of commercial space, representing an FAR of about 14:1, including ground-floor retail and lobby space and 16 floors of office use. There would be no residential development on the site.

A one-level parking garage would be provided, accommodating about 40 vehicles. The gross floor area of the parking garage would be about 17,000 sq. ft., about 7% of the gross floor area of the building. Loading space for two service vehicles would be accessible via Merchant St.

Under Alternative Three A, the building would step down in height in a series of three setbacks, from 278 ft. (18 stories) along the Merchant St. frontage, to about 45 ft. (3 stories) along the Washington St. frontage. The structure would have diagonal setbacks from the corner of Montgomery and Washington Sts., and from Merchant St. at the southwest border of the site. The ground-floor, parking level, and first office floor would be similar to those of the proposed project, but would include the diagonal setbacks. The next 5 floors, reaching a height of about 122 ft., would be setback from Washington St. approximately one-quarter of the site dimension. The next 5 floors, reaching a height of 200 ft. would be set back an additional 25% and the remaining 5 floors, reaching the height of 278 ft., would be again set back 25%. These top 5 floors would occupy the one-quarter of the site area along Merchant St. This alternative would be about 22 ft. shorter than the maximum permitted, and about 22 ft. shorter than the proposed project.



NOTE: Numbers Represent Building  
Heights at Each Setback.

SOURCE: Kaplan/McLaughlin/Diaz

● FIGURE 29A: Alternative Three A-  
Stepped Height Alternative

## X. Summary of Comments and Responses

Land use effects would be similar to those of the proposed project except that Alternative Three A would not satisfy any of the housing demand which would be generated by on-site office space. This alternative would not result in 24-hour activity on the site or in demand for resident-oriented retail services in the Financial District through the provision of residential space. Alternative Three A would comply with the bulk and use provisions of The City Planning Code.

Urban design effects of this alternative would differ from the proposed project because of the decreased building height and series of setbacks from the Washington St. frontage; however, the building tower would be more visible than existing structures on the site. Pedestrian-level views from near the site would be similar to those of the project except that the bulk along Washington St. would be reduced. The effect of this alternative on views of existing buildings east of the site from the Portsmouth Square area would be less than for the proposed project. Shadow effects would be lessened in comparison to the project but, as with the project, portions of Jackson Square would be shaded under this alternative during afternoon hours in the winter, spring and autumn.

This alternative would result in demolition of the existing structures on the site and removal of the surface parking lot. Construction traffic, air quality and noise impacts would generally be similar to the proposed project. Energy consumption impacts would be similar to the proposed project for the office portion of the building. In total, this alternative would consume about 10% less energy than the project because residential use would not be included. Operational traffic impacts would be similar to the proposed project, but with no residential use there would be less off-peak travel in the site vicinity.

The project sponsor has rejected this alternative as not contributing housing to partially meet existing demand in San Francisco.

D. STAFF-INITIATED TEXT CHANGES

Since publication of the DEIR, a number of errors and omissions in the report have been identified. The staff-initiated text changes described below are proposed to correct these errors and omissions.

Because approval of the project as proposed would necessitate changes in the City Planning Code, two additional EIR sections are required in order to comply with Sections 15143(e) and 15143(f) of the California Environmental Quality Act. Therefore, the following are added to the DEIR as Sections VIII. and IX., p. 139a. (The remaining EIR Chapters are renumbered as follows:

X. EIR AUTHORS AND CONSULTANTS; ORGANIZATIONS AND PERSONS CONSULTED;  
XI. DISTRIBUTION LIST; XII. APPENDICES.)

VIII. RELATIONSHIP BETWEEN SHORT-TERM USE OF MAN'S ENVIRONMENT AND THE  
ENHANCEMENT OF LONG-TERM PRODUCTIVITY

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This project would be part of a trend of denser development in Downtown San Francisco, contributing to a skyline characterized by high-rise office buildings in an area that is already urbanized. This area supplies facilities that provide employment opportunities and the basis for the regional economy. The project is intended to supply office space in the Downtown area to partially meet current demand. Approval by the Board of Supervisors and City Planning Commission of an amendment to the City Planning Code to allow approval of the project as proposed could result in denser downtown development and in the provision of more housing in mixed-use buildings in the downtown.

IX. IRREVERSIBLE ENVIRONMENTAL CHANGES

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The project would result in the removal of two existing structures on the site, neither of which are listed in the City Planning Commission's official list of Architecturally and/or Historically Significant Buildings in the Downtown. The 643 Montgomery St. building, the Iron Pot Restaurant, a parking lot, and a vacant lot would be replaced by a 24-story building. Demolition and construction would result in an irreversible commitment of material and energy resources. For the life of the proposed building, operation and maintenance would entail the use of mechanical equipment and energy consumption, as well as effects on air quality, water usage, and wastewater and solid waste disposal. The project would shade streets and sidewalks in

the Jackson Square Historic District and project vicinity by eliminating existing corridors of sunlight between combinations of existing structures.

#### ENVIRONMENTAL SETTING

The fourth full paragraph on p. 32 of the DEIR, which continues as the first partial paragraph on p. 34, describes proposed or approved projects within three blocks of the project site. The following sentences are added at the end of the first partial paragraph on p. 34 of the DEIR: "A five story office building has been proposed on the corner of Pacific and Columbus Aves., two blocks northwest of the site and a two- to five-story office building has been proposed on the corner of Pacific Ave. and Montgomery St., two blocks north of the site. Development of the block bounded by Washington, Kearny, and Jackson Sts. and Columbus Ave. is under consideration by a number of property owners. The so-called International Hotel project, presently in the preliminary stage of design, may involve a combination of office and residential use on several parcels of this block (Eva Levine, Department of City Planning, telephone communication, January 15, 1982)."

#### ENVIRONMENTAL IMPACTS

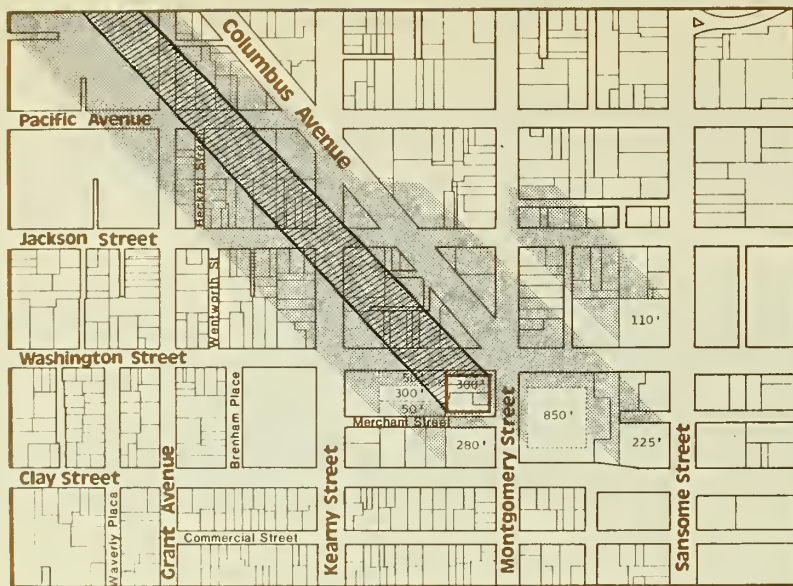
The second and third sentences of paragraph three on p. 46 of the DEIR are revised as follows: "The building length would be about 130 ft., 40 ft. less than the permitted maximum of 170 ft. and 8 ft. less than the site length of about 138 ft. The diagonal dimension of 180 ft. would be about 20 ft. less than the permitted maximum of 200 ft. and 8 ft. less than the site diagonal dimension of about 188 ft.

The following sentences are added after the second sentence of paragraph two on p. 28 and at the end of the third paragraph on p. 46 of the DEIR: "According to Section 134 of the City Planning Code, a 25% rear yard (i.e. 25% of lot depth) would be required at the first residential level and for each succeeding residential level in this C district. The project as proposed would require a Variance from this requirement as described in Section 305 of the Code."

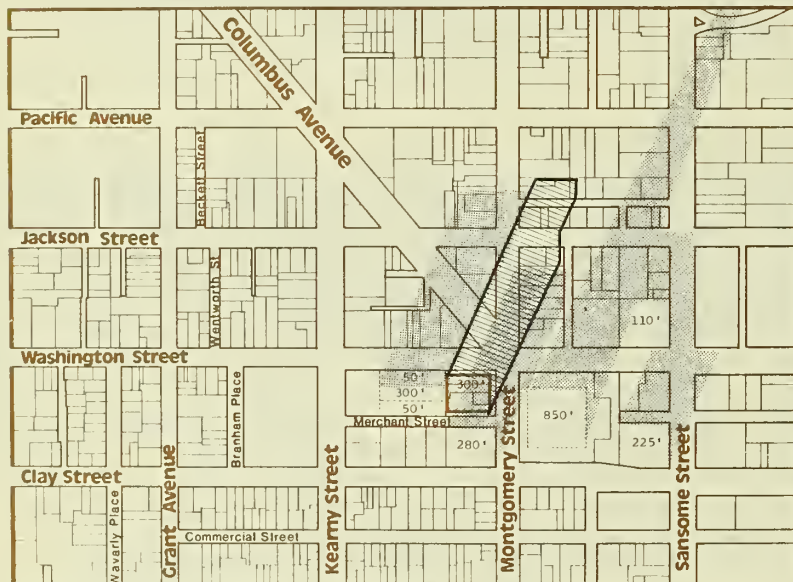
The last sentence (lines 3-5) of the third full paragraph on p.47 of the DEIR is revised to read: "An amendment to the City Planning Code, and possibly a change in the Interim Controls, would be required to allow approval of the project."

The third sentence (lines 3-5) of the first full paragraph on p. 53 of the DEIR is revised as follows: "The project would interrupt some views to the west from portions of the Transamerica Pyramid; however, affected views are already partially blocked by the Holiday Inn."

Figure 22, Projected Shadow Patterns in Vicinity of Project Mid-December, is incomplete as shown in p. 64 of the DEIR. A revised Figure 22, to be substituted for p. 64 of the DEIR is shown on p. 201 of this document.





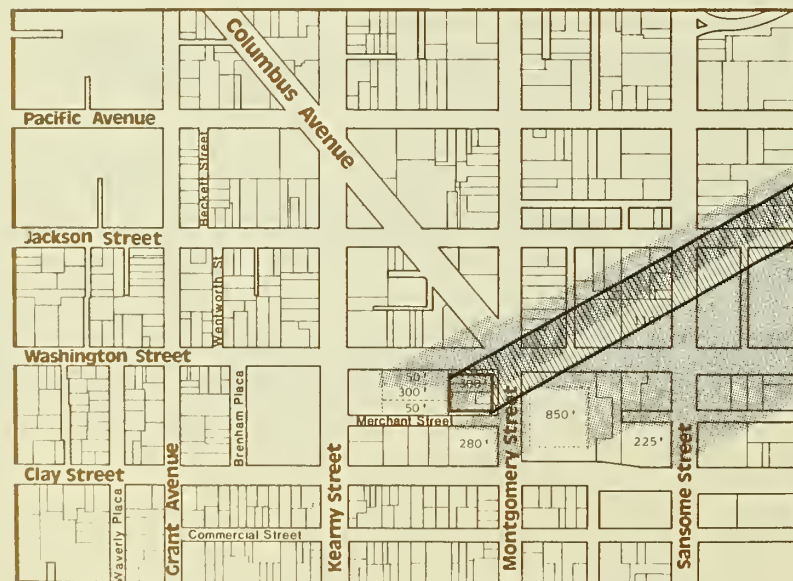
8 A.M.



1 P.M.

#### LEGEND

-  Proposed Building Shadow
-  Existing Shadow



4 P.M.

● **FIGURE 22**  
Projected  
Shadow Patterns  
in Vicinity  
of Project  
Mid-December

The second sentence (lines 2-3) of the first paragraph on p. 91 of the DEIR is revised to read: "A ramp to the garage, at a grade of 1:10, is proposed from Merchant St. and would provide sufficient maneuvering space for passenger vehicles."

#### MITIGATION MEASURES

The following Mitigation Measure is added on p. 114 of the DEIR under C. Employment, Housing and Fiscal Factors as a MEASURE REJECTED:

10a. The project sponsor could build low-rise housing in Chinatown to respond to the housing demand in San Francisco generated by the project. This mitigation measure has been rejected by the project sponsor for several reasons. The Chinatown area is intensively built-up and few single sites exist, large enough to accommodate the total housing demand generated by the project in one low-rise structure. (Eva Levine, Department of City Planning, telephone communication, January 6, 1982.) To accommodate the project housing demand in low-rise buildings in the site vicinity, it would be necessary for the sponsor to obtain several smaller sites. Even if sufficient sites were available, it might not be cost-effective for the sponsor to develop low-rise housing compared to condominiums atop an office structure. (Low-rise housing would have a higher land cost in proportion to total cost than would high rise condominiums.) The provision of housing exclusively off-site would not respond to "Objective 2 of Policy 2 of the Residence Element of the Comprehensive Plan which recommends 'multiple-residential development in conjunction with commercial uses in the Downtown commercial area.'" (see p. 49, paragraph two of the DEIR).

#### ALTERNATIVES TO THE PROPOSED PROJECT

The word "southeast" in line 9 of paragraph two on p. 126 of the DEIR is incorrect; the last sentence of this paragraph should be revised to read: "Residential units would be eliminated in the southwest corner of the building at the upper three stories to reduce the residential floor area to an amount consistent with identified bonus space." [emphasis added] To further clarify the design proposed as Alternative One, it should be noted that the reduction in bulk at the southwest corner of the building is intended to result in conformity of the Alternative with the City Planning Code and is not related to a transition between the project and the Jackson Square Historic District. As noted in paragraph two, p. 54 of the DEIR, "The project design includes a series of upper level setbacks, 'stepping down' in the northeast and southeast facing facades of the building (see Figure 21, p. 59)." Alternative One would also include such setbacks. In developing the Alternative One design the project architect did not modify these upper-level setbacks, which are intended to provide some transition between the taller Financial District buildings and the low-rise Jackson Square Historic District.

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2450-15th Street  
San Francisco, CA 94114

Telegraph Hill Dwellers Association  
426 Vallejo Street  
San Francisco, CA 94133  
Attention: Jim Augustino

Telegraph Hill Neighborhood Association  
660 Lombard Street  
San Francisco, CA 94133  
Attention: Peter Gibb

Tenant & Owners Development  
Corporation  
177 Jessie Street  
San Francisco, CA 94105  
Attention: John Elberling

Albert Tetzlaff  
191 Dalewood Way  
San Francisco, CA 94127

Paul Thayer  
1033 Stanyan  
San Francisco, CA 94117

TJKM, Traffic Consultants  
675 Ygnacio Valley Rd.,  
Suite 211  
Walnut Creek, CA 94596

Tim Tosta  
333 Market Street, Suite 2230  
San Francisco, CA 94105

Steven Weicker  
899 Pine Street, #1610  
San Francisco, CA 94108

### ABUTTING PROPERTY OWNERS

Crow-Spieker-Cahill  
2180 Sand Hill Road  
Menlo Park, CA 94025  
Attention: Warren E. Spieker, Jr.

Crow-Spieker Companies  
601 Montgomery Street, Suite 410  
San Francisco, CA 94111  
Attention: Patrick J. Gilligan

Four Seas Investment Corp.  
c/o Reality Investment Concepts Inc.  
22 Battery St., Suite 666  
San Francisco, CA 94111  
Attention: Arthur Leong

Holiday Inn  
750 Kearny Street  
San Francisco, CA 94108  
Attention: Arthur Yue, Building Manager

## XII. Distribution List

Justice Enterprises, Inc.  
1 Embarcadero Center, Suite 3303  
San Francisco, CA 94111

Justice Enterprises, Inc.  
1 Embarcadero Center, Suite 3303  
San Francisco, CA 94111  
Attention: Harold L. Moose, Jr.

Doro's Restaurant  
c/o Milton Meyer & Co.  
1 California Street  
San Francisco, CA 94111

Transamerica Title Insurance Co.  
Premier Insurance Co.  
600 Montgomery Street  
San Francisco, CA 94111  
Attention: John Hall

Transamerica Corporation  
Orrick, Herrington and Sutcliffe  
600 Montgomery Street, 10th Floor  
San Francisco, CA 94111  
Attention: David Spielberg

Calvin Welch  
409 Clayton  
San Francisco, CA 94117

Gary Wong  
3732-38th Avenue  
Oakland, CA 94619

Stan Ya  
300 Montgomery St., Suite 731  
San Francisco, CA 94104

### NEWS MEDIA

San Francisco Bay Guardian  
2700 19th Street  
San Francisco, CA 94110  
Attention: David Johnston

San Francisco Chronicle  
925 Mission Street  
San Francisco, CA 94103  
Attention: Marshall Kilduff,  
Allen Temko

San Francisco Examiner  
110 Fifth Street  
San Francisco, CA 94103  
Attention: Gerald Adams

San Francisco Progress  
851 Howard Street  
San Francisco, CA 94103  
Attention: Mike Mewhinney

### LIBRARIES

Environmental Protection Agency Library  
215 Fremont Street  
San Francisco, CA 94105  
Attention: Jean Circiello

Hastings College of the Law Library  
198 McAllister Street  
San Francisco, CA 94102

Golden Gate University Library  
536 Mission Street  
San Francisco, CA 94105

San Francisco Public Library  
Main Branch, Documents Section  
208 Larkin Street  
San Francisco, CA 94102

San Francisco Public Library  
Business Branch  
530 Kearny Street  
San Francisco, CA 94104

San Francisco State Library  
Government Publications  
San Francisco State University  
1600 Holloway Avenue  
San Francisco, CA 94132

Stanford University Library  
Government Documents Section  
Stanford, CA 94305

University of San Francisco  
Gleeson Library  
Golden Gate and Parker Avenues  
San Francisco, CA 94115

XIII. CERTIFICATION RESOLUTION

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## SAN FRANCISCO

## CITY PLANNING COMMISSION

## RESOLUTION NO. 9293

WHEREAS, A draft environmental impact report, dated November 13, 1981, has been prepared by the Department of City Planning in connection with 81.104E: Montgomery - Washington Building. Construction of a 300-foot-tall, 24-story combined office and residential condominium building with street level commercial use and 62 parking spaces, after demolition of a one-story and a two-story building on the property described as follows:

The southwest corner of Washington and Montgomery Streets,  
Lots 2-4 and 25 in Assessor's Block 208.

WHEREAS, The Department duly filed a notice of completion of the draft report with the Secretary of the California Resources Agency, gave other notice and requested comments as required by law, made the report available to the general public and satisfied other procedural requirements; and

WHEREAS, The City Planning Commission held a duly advertised public hearing on said draft environmental impact report on December 17, 1981, at which opportunity was given for public participation and comments; and

WHEREAS, A final environmental impact report, dated January 28, 1982, has been prepared by the Department, based upon the draft environmental impact report, any consultations and comments received during the review process, any additional information that became available, and a response to any comments that raised significant points concerning effects on the environment, all as required by law; and

WHEREAS, On January 23, 1982, the Commission reviewed the final environmental impact report, and found that the contents of said report and the procedures through which it was prepared, publicized and reviewed comply with the provisions of the California Environmental Quality Act, the Guidelines of the Secretary for Resources and San Francisco requirements;

THEREFORE BE IT RESOLVED, That the City Planning Commission does hereby find that the Final Environmental Impact Report, dated January 28, 1982 concerning 81.104E is adequate, accurate and objective, and does hereby CERTIFY THE COMPLETION of said Report in compliance with the California Environmental Quality Act and the State Guidelines;

### XIII. Certification Resolution

AND BE IT FURTHER RESOLVED, That the Commission in certifying the completion of said Report does hereby find that the project as proposed will have a significant effect on the environment in that the proposal will create a specific demand for housing from the project itself, and will contribute to the cumulative increase in transit ridership and pedestrian and vehicular traffic; air quality; and housing impacts produced by development approved and under construction in the downtown area.

I hereby certify that the foregoing Resolution was ADOPTED by the City Planning Commission at its regular meeting of January 28, 1982.

Lee Woods, Jr.  
Secretary

AYES: Commissioners Karasick, Kelleher, Klein, Nakashima, Rosenblatt, Salazar

NOES: Commissioner Bierman.

ABSENT: None.

PASSED: January 28, 1982

## XIV. APPENDICES

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APPENDIX A: FINAL INITIAL STUDY\*

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MONTGOMERY - WASHINGTON BUILDING

SAN FRANCISCO

81.104E

September 1981

\* Differences among data presented in the following Initial Study and the preceding Focused EIR are attributable to the availability of additional and more precise data during the subsequent preparation of the EIR.



# DEPARTMENT OF CITY PLANNING

100 LARKIN STREET - SAN FRANCISCO, CALIFORNIA 94102  
(415) 552-1134

## NOTICE THAT AN ENVIRONMENTAL IMPACT REPORT IS DETERMINED TO BE REQUIRED

Date of this Notice: September 18, 1981

Lead Agency: City and County of San Francisco, Department of City Planning  
100 Larkin Street, San Francisco, CA. 94102

Agency Contact Person: Carol Roos

Tel: (415) 552-1134

Project Title: 81.104E:  
Montgomery-Washington Building

Project Sponsor: Crow-Spieker Companies

Project Contact Person: Patrick Gilligan

Project Address: Southwest corner of Washington and Montgomery Streets

Assessor's Block(s) and Lot(s): Assessor's Block 208, Lots 2-4 and 25

City and County: San Francisco

Project Description: Construction of a 24-story combined office and residential condominium building with street level commercial use and 57-car garage, after demolition of a one-story building and a two-story building.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15081 (Determining Significant Effect), 15082 (Mandatory Findings of Significance) and 15084 (Decision to Prepare an EIR), and the following reasons, as documented in the Initial Evaluation (initial study) for the project, which is on file at the Department of City Planning:

Please see the attached Initial Study.

Deadline for Filing of an Appeal of this Determination to the City Planning Commission: September 28, 1981.

An appeal requires 1) a letter specifying the grounds for the appeal, and 2) a \$35.00 filing fee.

  
Alec S. Bash, Environmental Review Officer

MONTGOMERY-WASHINGTON  
BUILDING  
INITIAL STUDY  
81.104E

PROJECT DESCRIPTION

The project would be a 24-story combined office and residential condominium building proposed for development on the block bounded by Washington, Montgomery, Clay and Kearny Sts. The 17,400 sq.-ft. site encompasses four separate parcels on the northeast corner of Assessor's Block 208. Merchant St., a one-block-long service street, bisects the block in an east-west direction.

The site is in a C-3-0 (Downtown Office) District and a 300-H height and bulk district. The allowable Basic Floor Area Ratio (FAR) for the site is 14:1.

The site is currently in commercial use, with the exception of one vacant parcel. The parcel, Lot 25 at the corner of Washington and Montgomery Sts., is in City ownership. This lot was originally six separate lots, which were acquired by the City's Department of Public Works (DPW) in four separate transactions from June 1970 to February 1973. Portions of the land were used to widen Washington St.; the remainder was subsequently declared to be surplus by DPW. The project sponsor proposes to bid on and purchase Lot 25 at public auction in 1981. The adjacent Lots 2 and 3 contain two- and one-story brick structures, respectively, including approximately 4,900 gross sq. ft. of restaurant space and 3,000 gross sq. ft. of office space. These buildings would be demolished. The parcel at the corner of Montgomery and Merchant Sts. (Lot 4) contains a surface parking lot with about 45 spaces.

The proposed project would be a 300-ft. high, 24-story mixed-use building. Development would be in the following mix: about 7,000 gross sq. ft. of ground-floor lobby and retail space; 1 double-height level of parking with mezzanine, above the lobby level and accessible from Merchant St. (about 25,000 gross sq. ft. containing approximately 62 parking spaces and about 3,300 gross sq. ft. containing two truck loading docks); about 236,600 gross sq. ft. of office space in 15 stories; about 77,500 gross sq. ft. of

market-rate condominium residential space in six stories (approximately 40 units); a recreation facility for residents (about 4,000 sq. ft.); and about 8,000 sq. ft. of mechanical/building-service space on two levels, consisting of a structural basement (cellular foundation) and a mechanical service area, on the floor between the office and residential space; there would also be a rooftop mechanical penthouse. The project would include about 17,500 gross sq. ft. of open space in the following mix: about 10,000 sq. ft. of rooftop common open space; about 4,400 sq. ft. of private open space consisting of balconies and decks for the residential units; and about 3,100 sq. ft. in a pool area located at the first residential level.

---

TABLE 1: Existing Uses at the Project Site: Assessor's Block 208, Lots 2,3,4 and 25.

---

<u>Lot No.</u>	<u>Land Area in Sq. Ft.</u>	<u>Current Use</u>	<u>Tenant</u>	<u>Owner</u>
2	3,320	Commercial: restaurant/offices	-Lafayette Restaurant -F.O.Merwin, Architect -Therese Weedy, Photographer	Project Sponsor  Project Sponsor
3	1,920	Commercial: restaurant	-Iron Pot Restaurant	Project Sponsor
4	7,340	Commercial: surface valet parking lot	-Montgomery Parking	Project Sponsor
25	4,820	vacant	none	C.C.S.F.*
0 Total	17,400			

---

\*City and County of San Francisco

SOURCE:

---

Development of retail, restaurant, and office floors would be at a 14:1 floor area ratio (FAR), excluding residential uses. The building would be about the same height as the Holiday Inn on the West.

The project would include widened sidewalks, three major building entrances, a street-level pedestrian arcade to facilitate shortened walking distances, and a tower of sculptured form. The building would be setback at the Montgomery/Washington corner, to preserve views from upper Columbus Ave. and respond to the configuration of the Transamerica building. The building setbacks at this corner would extend the entire height of the project and would increase, in a stepped manner, at the upper levels. The faceted upper-floor setbacks, diagonally terracing the northeast corner of the building, were designed to reduce the apparent bulk and scale of the building as seen from the Jackson Square Historic District and Telegraph Hill. The total gross floor area of the building would be approximately 329,800 sq. ft., an FAR of 19:1 and would exceed the Basic FAR by about 5:1, or approximately 86,200 sq. ft. (excluding cellular foundation, mechanical and parking floor area).

The project sponsor is Crow-Spieker Companies of San Francisco, doing business as Trammell Crow Company. Project architects are Kaplan/McLaughlin/Diaz of San Francisco, and the IBI Group of Newport Beach, CA.

#### POTENTIAL ENVIRONMENTAL EFFECTS

Potential environmental issues associated with project implementation include: transportation, particularly circulation in relation to Chinatown and the Financial District, and transit effects; urban design, the project in relation to adjacent and nearby high-rise buildings, the smaller-scale Jackson Square Historic District and the Telegraph Hill community, including views; traffic-generated air quality effects; shadow and wind effects; energy consumption; and construction noise.

These issues require analysis in subsequent environmental documentation for the project.

Potential environmental issues associated with the project that have been determined in this Initial Study to be insignificant, and, therefore, not to be addressed in subsequent environmental documentation for the project, are described below, and discussed later in this Initial Study.

Land Use Compatibility: The project would be consistent with existing and proposed land uses in the vicinity of the site. The project would comply with the height provisions of the City Planning Code, but would exceed the height recommendations for the site contained in the Department of City Planning document, Guiding Downtown Development.

Noise: After completion, the project would not increase audible noise levels in the project vicinity.

Public Services and Utilities: The demand for public services and utilities would not require additional personnel or equipment, with the exception of fire protection services in the case of a major fire or disaster.

Biology: The project would not directly affect plants or animals, as the site is urbanized. Three of the four lots are covered with buildings or pavement. Lot 25 was covered with structures which were demolished to make way for a street widening. The site is now covered with grass and weeds.

Land/Geology/Soils: The site is on bedrock and the project would not require substantial excavation, grading or dewatering. The average depth of excavation would be about 20 ft. Dewatering would be required only during the construction period. Pile driving would not be required as a mat (cellular) foundation would be used.

Cultural/Historic: No known cultural resources or structures designated to be of architectural or historic importance would be affected by project implementation. See p. 29 for a mitigation measure in case archaeological resources are found during project excavation. The project would result in the removal of the two existing buildings on the site. The building at 643 Montgomery St. was rated in the architectural survey conducted for the Foundation for San Francisco's Architectural Heritage. It is not, however, included in the City's official list of Architecturally and/or Historically Significant Buildings in the Downtown. The building at 639 Montgomery St. was not rated in either architectural survey.

Construction-related Air Quality: Construction activities would not increase the frequency of violations of air quality standards as monitored by the Bay Area Air Quality Management District (BAAQMD) at Van Ness Ave. and Ellis St.,

about one-and-a-quarter miles southwest of the site. See p. 26 for measures which would reduce temporary particulate emissions during construction.

Hazards: Project operation would not increase the risk of explosion or release of hazardous substances, in the event of an accident, or cause other dangers to public health and safety.

Water Quality: Project operation would not affect the quality or quantity of public water or groundwater in the project vicinity. Shallow dewatering would be required during project construction.

A. GENERAL CONSIDERATIONS:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. Would the project conflict with objectives and policies in the Comprehensive Plan (Master Plan) of the City? (Please see discussion below.)	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>  X  </u>
2. Would the project require a variance, or other special authorization under the City Planning Code?	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>  X  </u>
3. Would the project require approval of permits from City Departments other than DCP or BBI, or from Regional, State or Federal agencies?	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>      </u>
4. Would the project conflict with adopted environmental plans and goals?	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>      </u>

The project would provide new housing and commercial office space in the Downtown core of San Francisco on a site that is close to local and regional transit facilities. It would comply with Objective 6 of the Commerce and Industry Element of the Comprehensive Plan to support San Francisco as "a prime location for financial, administrative, corporate, and professional activity", and would comply with policies of the Commerce and Industry Element to "maintain a compact downtown core" and to "provide adequate amenities for those who live, work and use Downtown". The project would comply with the Residence Element of the Comprehensive Plan which recommends "multiple-residential development in conjunction with commercial uses in the Downtown commercial area." Additionally, the project would comply with

recently proposed Department of City Planning (DCP) policies which recommend that new office buildings also provide housing (outlined in the DCP study document entitled Guiding Downtown Development, May 1981). The San Francisco Sub-Division Code requires provision of 10% low and moderate income housing in projects which would contain more than 50 dwelling units, provided subsidies are available. The project would provide about 40 condominiums and would not include any low and moderate housing.

The sculptured stepped and set back design of the project's upper northeast- and southwest-facing facades attempts to comply with the Urban Design Element of the Comprehensive Plan by providing a height and bulk transition from the nearby 52-story (778 ft.) Bank of America building at California and Montgomery Sts., the 48-story (853-ft.) Transamerica building, directly east of the site across Montgomery St., and the smaller-scale 2- to 8-story structures which characterize the Jackson Square Historic District, north and northeast of the site. The shaping of the upper part of the project tower is intended by the architect to insure that its vertical elements, which are similar in height to the adjacent Holiday Inn building, would be in different planes, providing a distinct visual separation between the two buildings. The project would also comply with the policy of the Urban Design Element of the Comprehensive Plan to "promote harmony in the visual relationships and transitions between new and older buildings" (Policy 1, "Urban Design Element, Policies for Major New Development").

The project site includes a 4,820 sq. ft. parcel (Lot 25) which is in City ownership and was designated as a potential open space site in the Recreation and Open Space Element of the Comprehensive Plan (Amendment No. 7-8-75, January 4, 1978). The site was examined for development as a downtown mini park. The Recreation and Park Commission (RPC) determined that this parcel is not appropriate for such use because of its size and the shading caused on the parcel by nearby buildings. On April 9, 1981 the Recreation and Park Commission recommended to the City Planning Commission that the designation of the parcel as a potential open space site be removed and the parcel be offered for sale to the public (RPC Resolution No. 12456). The RPC further recommended that a portion of the proceeds from the sale of this property be deposited in the City's Open Space account to be used to develop, redevelop or otherwise improve open space resources within the Chinatown community. The Planning and Recreation and Park Commissions had a joint meeting on

July 7, 1981 to review and act upon this proposal. At that time, the Recreation and Parks Commission voted to remove the potential open space designation. The City Planning Commission voted, by motion, on July 16, 1981 to remove the potential open space designation of the parcel, thereby eliminating the property from the Recreation and Open Space Element of the Comprehensive Plan. On September 15, 1981, the Board of Supervisors voted to authorize the sale of Lot 25.

The project would comply with the open space requirement for residential use in the C-3 District (Section 135(d) of the City Planning Code). The project would include about 17,500 gross sq. ft. of common and private open space for the project residents.

The project will require discretionary review by the City Planning Commission (CPC) under the provisions of Resolution No. 8474, adopted January 17, 1980. The project would include approximately 40 residential condominium units which would exceed the site's allowable Basic Floor Area by about 86,200 gross sq. ft. (including the residential elevators and accessory recreation room). Under existing interim controls on downtown high-rise office development (Municipal Ordinance No. 240-80, effective July 1, 1980), buildings within the downtown commercial (C-3) district which contain residential units may be permitted development (floor area) bonuses by Conditional Use authorization. The proposed project design incorporates pedestrian amenities, including multiple building entrances, shortened walking distances and sidewalk widening, which may qualify for bonus floor area of about 67,400 gross sq. ft. (pursuant to Section 126 of the San Francisco Planning Code) to be used for the residential portion of the building. The project sponsor intends to request approximately 86,200 sq. ft. of bonus space to permit the amount of housing proposed.

The project sponsor proposes to provide 62 parking spaces (25,000 sq. ft.) and 2 freight loading spaces (3,300 sq. ft.) within the building's enclosed one-level plus mezzanine, double-height parking facility. About 17,000 sq. ft. of the parking space, representing seven percent of the gross office floor area, would be designated as short-term parking for the office portion of the building. Fifteen spaces, or about 6,000 sq. ft., would be allocated to the residential units as 150% of the residential parking requirement in a C-3 District. The project sponsor would apply for a Conditional Use authorization

to designate the remaining 2,000 sq. ft. of parking space as additional parking space for the residential units.

B. ENVIRONMENTAL IMPACTS:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. <u>Land Use.</u> Would the proposed project:					
a. Be different from surrounding land uses?	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>  X  </u>
b. Disrupt or divide the physical arrangement of an established community?	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>  X  </u>

Although the project would develop combined housing and commercial space within a single high-rise structure, both high-density residential and office uses are found within the surrounding area. The site lies at the northwest corner of the City's Financial District, and the Transamerica and 601 Montgomery high-rise office buildings are located immediately east and south of the project site. Additionally, the Bank of America, Alcoa and One and Two Embarcadero Center high-rise office buildings are located within 3 blocks of the site. Surrounding residential uses include the Chinatown community one block west of the site, and the four, 25-story Golden Gateway towers (1,260 rental units) two to four blocks northwest of the site. The City's Redevelopment Agency is currently developing the 150-unit, low-rise Golden Gateway Commons condominium apartment complex within four blocks of the project site.

The project would replace about 4,900 sq. ft. of restaurant space, 3,000 sq. ft. of office space and 7,340 sq. ft. of parking space with approximately 4,000 sq. ft. of restaurant space, about 500 sq. ft. of ground-floor, retail space, 238,820 sq. ft. of office space, 25,140 sq. ft. of parking and loading space, 64,800 sq. ft. of residential space and 4,500 sq. ft. of indoor recreation space for residents.

2. Visual Quality and Urban Design. Would the proposed project:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Obstruct or degrade any scenic view or vista open to the public?	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>  X  </u>
b. Reduce or obstruct views from adjacent or nearby buildings?	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>  X  </u>

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
c. Create a negative aesthetic effect?	<u>    </u>	<u>  X  </u>	<u>    </u>	<u>    </u>	<u>  X  </u>
d. Generate light or glare affecting other properties?	<u>    </u>	<u>    </u>	<u>  X  </u>	<u>    </u>	<u>  X  </u>

The building would not be visible from freeways due to intervening structures. The project would interrupt some views from nearby buildings; in general, interrupted views would be replaced by similiar views from the proposed structure. The adjacent Holiday Inn is north/south facing and occupants would not have a view of the proposed building./1/ Views from the project's residential units would be oriented north and east, with the exception of 16 units which would have a north/south orientation. With mitigation, such as window shades or curtains, nighttime light from adjacent office buildings would not adversely affect project residents. Residential units would be higher than the adjacent 19-story 601 Montgomery office building. East-facing units would have nighttime views of the lighted Transamerica building. However, the approximately 100-ft. distance from the site and the narrowed shape of the Transamerica building would be expected to reduce the apparent mass of that building as seen by residents.

The building would change the view of the Downtown, Financial District cityscape and urban forms as seen from Telegraph Hill. For example, from Telegraph Hill, views of the 19-story, 601 Montgomery St. building would be replaced with views of the sculptured 24-story project building, which would make a visual transition from the taller Bank of America and Transamerica buildings to the smaller-scale Jackson Square District, north and northeast of the site.

The building would contain no reflective glass or high intensity lighting, and hence would not impose a reflective or glaring light on other properties or The Embarcadero Freeway off-ramp.

The relationship of the project to design guidelines developed by the City in 1973 for a previously proposed project on the site and the potential visual effect of site development on the Portsmouth Corridor will be discussed in subsequent environmental documentation for the project.

NOTE - Visual Quality and Urban Design

/1/ Photographs showing views from rooms in the Holiday Inn are on file at the Department of City Planning, Office of Environmental Review, 45 Hyde St., Room 319.

3. Population/Employment/Housing. Would the proposed project:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Alter the density of the area population?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>X</u>
b. Have a growth-inducing effect?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>X</u>
c. Require relocation of housing or businesses, with a displacement of people, in order to clear the site?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>
d. Create or eliminate jobs during construction and operation and maintenance of the project?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>X</u>
e. Create an additional demand for housing in San Francisco?	<u>    </u>	<u>X</u>	<u>    </u>	<u>    </u>	<u>X</u>

The project would increase the number of employees on-site from approximately 30 to approximately 980. Approximately 14 existing employees, of the two restaurants, professional offices, and parking lot on the site, would be displaced. It can be expected that the project's estimated 950 office sector jobs would create about 1,140 additional "secondary" jobs in the city's business services sector, this could have a growth-inducing effect by attracting new residents to the City.

During construction a total of about 400 person-years of employment would be created, with an average of 150 workers employed at any one time.

The project would be expected to generate a demand for housing units in San Francisco. The effect this additional demand would have on the City's housing market will be evaluated in subsequent environmental documentation for the project. The proposed residential component of the project would contribute to mitigation of this anticipated housing impact. The effects of business displacement will also be addressed in the subsequent environmental document.

4. Transportation/Circulation. Would the construction or operation of the project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Change in use of existing transportation systems?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>X</u>
b. An increase in traffic which is substantial in relation to existing loads and street capacity?	<u>    </u>	<u>    </u>	<u>X</u>	<u>    </u>	<u>X</u>
c. Effects on existing parking facilities, or demand for new parking?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>X</u>
d. Alteration to current patterns of circulation or movement of people and/or goods?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>X</u>
e. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?	<u>    </u>	<u>X</u>	<u>    </u>	<u>    </u>	<u>X</u>
f. A need for maintenance or improvement or change in configuration of existing public roads or facilities?	<u>    </u>	<u>    </u>	<u>X</u>	<u>    </u>	<u>X</u>
g. Construction of new public roads?	<u>    </u>	<u>    </u>	<u>X</u>	<u>    </u>	<u>    </u>

The project would result in an increased use of existing transportation systems, both nearby freeways and local streets, and the local Municipal Railway (MUNI) transit and regional transit systems which serve Downtown San Francisco. The project would generate a parking demand that would be met partially by on-site parking. At least one permanent, long-term parking space would be provided for each four residential units according to City parking requirements for this zoning district. Approximately 45 short-term parking spaces would be provided as accessory parking for office space users. A total of about 62 parking spaces are proposed with the project.

A detailed analysis, including an estimate of the number of automobile, and freight vehicle trips generated by the project, the impacts of such traffic on nearby streets and intersections, an estimate of parking and loading needs, the effects of the project on pedestrian movements in the project vicinity, and project and cumulative impacts on the local MUNI transit routes and on regional systems will be presented in subsequent environmental documentation.

The project would require no change in the present pattern of circulation or in the configuration of existing public streets.

5. Noise.

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Would the proposed project result in generation of noise levels in excess of those currently existing in the area? (During construction)	___	<u>X</u>	___	___	<u>X</u>
b. Would existing noise levels impact the proposed use?	___	___	<u>X</u>	___	<u>X</u>
c. Are Title 25 Noise Insulation Standards applicable?	<u>X</u>	___	___	___	<u>X</u>

Noise levels in the area would not be expected to exceed currently existing levels as a result of project operation. Potential operational noise impacts associated with the project are of two types: noise generated by the building's mechanical equipment and project-related traffic. Construction noise associated with site development would temporarily increase noise in the area during the 18-month construction period.

The Downtown San Francisco noise environment is dominated by vehicular traffic noise. Traffic generated by the project during any hour of the day would cause traffic noise to increase by less than 1 decibel (dBA)./1/ A 1 dBA increase in environmental noise is undetectable by the untrained human ear.

Noise due to mechanical equipment is regulated by the San Francisco Noise Ordinance, Section 2909, "Fixed Source Noise Levels" (San Francisco Municipal Code, Part II, Chapter VIII Section 1, Article 29, 1972). The site is in the C-3-0 (Downtown Office) District. In this zone the ordinance restricts equipment noise levels at the property line to 70 dBA between 7 A.M. and 10 P.M. and 60 dBA between 10 P.M. and 7 A.M. During lulls in traffic, mechanical equipment noise levels of 70 dBA would tend to dominate the site noise environment. Equipment noise levels would be designed to meet the nighttime limit of 60 dBA and would not be audible above the ambient noise level of the site vicinity. This is particularly important due to the proximity of the Holiday Inn. Although mechanical equipment noise of 60 dBA

could be audible at the hotel, it is not expected that this noise would interfere with use of the hotel.

The Environmental Protection Element of the Comprehensive Plan indicates an existing day-night average noise level (Ldn) of 65 dBA on Washington St. and 70 dBA on Montgomery St./2/ The Element contains guidelines for determining the compatibility of land uses with various noise environments. For residential and office uses the guidelines recommend no special noise control measures in an exterior noise environment of up to an Ldn of 60 dBA and 70 dBA, respectively. As the exterior noise level at the height of the condominiums can be expected to be about 55 to 60 dBA, no special noise control measures would be required.

Title 25 of the California Administrative Code, Noise Insulation Standards, applies to all new residential structures, with the exception of single-family dwellings. The acceptable outdoor noise levels for all residential units is established as a community noise equivalent level (CNEL) equal to 60 dBA./3/ The exterior noise environment of the site exceeds a CNEL of 60 dBA at street level. The project requires an acoustical analysis to show that the interior residential CNEL requirement of less than 45 dBA with the windows closed would be met. As the project sponsor has stated that the project would be constructed to conform with Title 25 Noise Insulation Standards, existing noise levels would have no significant effect and no further discussion is needed./4/

Project construction would occur in 3 stages: demolition, excavation and construction of the new building. Throughout the 18-month construction period, trucks would be visiting the site, initially hauling away dirt and debris and then bringing materials. These activities would temporarily increase noise levels in the surrounding area.

The project is expected to use a mat (cellular) foundation, which would not require pile driving. The San Francisco Noise Ordinance limits the noise emission of powered construction equipment, except impact tools, to 80 dBA at 100 ft. It also prohibits construction work at night from 8 P.M. to 7 A.M., if the noise emission from such work exceeds the ambient noise level by 5 dBA at the property line, unless a special permit is authorized by the San Francisco Department of Public Works.

The Holiday Inn located adjacent to the site would be the most sensitive receptor of construction noise and noise impacts could result during the construction period. Although the hotel wall facing the site is constructed of at least one-ft.-thick concrete, interior noise levels at the hotel during project construction could be expected to reach as high as 46 dBA. At this level, the sounds would be audible but would not interfere with human speech or sleep. Noise levels in the surrounding 601 Montgomery St. and Transamerica buildings could reach 65 dBA and average about 60 dBA. Noise levels this high would interfere with human speech and concentration, distracting employees and degrading their performance./5/ Construction noise will be discussed in subsequent environmental documentation for the project.

#### NOTES - Noise

/1/ Decibel (dB) is a logarithmic unit of sound energy intensity. Sound waves, traveling outward from a source, exert a force known as sound pressure level (commonly called "sound level"), measured in decibels. dBA is decibel corrected for the variation in frequency response of the typical human ear at commonly-encountered noise levels.

/2/ Ldn is an averaged sound level measurement, based on human reaction to cumulative noise exposure over a 24-hour period, which takes into account the greater annoyance of nighttime noises. Noise between 10 P.M. and 7 A.M. is weighted 10 dBA higher than daytime noise.

/3/ Community noise equivalent level (CNEL); similar to Ldn except that sound level measurements taken between 7 P.M. and 10 P.M. are weighted 5 dBA higher than daytime sounds in addition to the 10 dBA 10 P.M. to 7 A.M. weighting.

/4/ Pat Gilligan, Crow-Spieker Companies, telephone communication September 15, 1981.

/5/ National Institute for Occupational Safety and Health, Occupational Exposure to Noise, 1972

#### 6. Air Quality/Climate. Would the proposed project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Violation of any ambient air quality standard or contribution to an existing air quality violation?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>X</u>
b. Exposure of sensitive receptors to air pollutants?	<u>    </u>	<u>X</u>	<u>    </u>	<u>    </u>	<u>X</u>
c. Creation of objectionable odors?	<u>    </u>	<u>    </u>	<u>X</u>	<u>    </u>	<u>    </u>
d. Burning of any materials including brush, trees, or construction materials?	<u>    </u>	<u>    </u>	<u>X</u>	<u>    </u>	<u>    </u>

Yes   Maybe   No   N/A   Disc.

- e.   Alteration of wind, moisture,  
or temperature (including sun shading  
effects), or any change in climate,  
either locally or regionally?

  X                            X  

Two types of air quality impacts would result from the proposed project: short-term construction impacts including particulate and hydrocarbon emissions, and long-term vehicle-related impacts, including carbon monoxide emissions. Concentrations of air pollutants are monitored by the Bay Area Air Quality Management District (BAAQMD) at Van Ness Ave. and Ellis St., about one-and-a-quarter miles southwest of the site.

Demolition, grading, and construction activities would affect local air quality for approximately 12 months. Construction activities, in general, generate approximately 1.2 tons of particulate (dust) per acre per month of activity./1/ This includes emissions from land clearing, excavation and project construction. Assuming 18 months of demolition, excavation, and construction activity on 0.4 acre, a total of approximately 9 tons of particulates would be generated. Without mitigation, this would result in a worst-case 24-hour average concentration of approximately 6,400 ug/m3 (micrograms per cubic meter) at and adjacent to the site, 64 times the 24-hour State standard of 100 ug/m3. The eight-hour concentration would be about three times the 24-hour concentration; no standard has been established for 8-hour particulate concentrations. Except to persons with respiratory disorders, large-size construction particulates are more a nuisance than a hazard, and settle out of the atmosphere rapidly with increasing distance from the source, in contrast to gaseous pollutants and to small-size particulates from combustion.

Pouring asphalt for driveways and using oil-based paints would generate hydrocarbon emissions. These types of emissions are controlled by Regulation 8 rules of the BAAQMD./2/ Diesel powered construction equipment would emit (in decreasing order by weight) nitrogen oxides, carbon monoxide (CO), sulfur oxides, hydrocarbons, and particulates. These emissions would not have any measurable effect on citywide or regional air pollution concentrations or on the frequency of standards violations./3/

Project-related traffic would add to local and regional accumulations of CO, hydrocarbons and nitrogen oxides, (the latter two precede ozone), particulates and sulfur oxides during adverse meteorological conditions, such as inversions (U.S. EPA, 1977, Compilation of Air Pollutant Emission Factors, AP-42). Ozone is a regional problem, and CO and particulates are local problems (ABAG, BAAQMD, and MTC, January 1979, 1979 Bay Area Air Quality Plan, San Francisco Bay Area, Environmental Management Plan). The project would thus impede attainment of standards, but would probably have no measurable effect on citywide or regional concentrations, or on the frequency of violation of the standards. These conclusions are based on the projected air quality impacts reported in Daon, Environmental Impact Report (EIR), EE 79.57 (pp. 189-193). The Daon project would contain about the same area as the proposed project and is not expected to cause violations of air quality standards, although it would minimally increase concentrations in the immediate area by less than 2%. If there were no air quality control strategies (emission standards), cumulative development in the Downtown area would increase ambient concentrations and the frequency of standard violations. Standards violations are not expected to occur and ambient concentrations are expected to decrease due to reduced emissions resulting from control strategies. Project related and cumulative air quality impacts will be evaluated in subsequent environmental documentation for the project.

The project would affect wind speed ratios at street level, probably increasing west winds along Washington St. The project would increase shadows on sidewalks and streets along Montgomery and Washington Sts. The building can also be expected to cast shadows on the buildings along the north side of Washington St. The effects of wind, sun and shadow on project occupants and nearby uses will be evaluated in the subsequent environmental documentation for the project.

#### NOTES - Air Quality/Climate

/1/ U.S. Environmental Protection Agency, 1975, Compilation of Air Pollutant Emission Factors, Supplement No. 5, p. 11.2.4-1.

/2/ Bay Air Quality Management District (BAAQMD), 1980, Rules and Regulations, BAAQMD, San Francisco.

/3/ U.S. Environmental Protection Agency, 1975, Compilation of Air Pollutant Emission Factors, Supplement No. 4, p.3.2.7-2,-3.

7. Utilities and Public Services. Would the proposed project:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Have an effect upon, or result in a need for new or altered, governmental services in any of the following?					
fire protection	—	X	—	—	X
police protection	—	—	X	—	X
schools	—	—	X	—	X
parks or other recreational facilities	—	—	X	—	X
maintenance of public facilities	—	—	X	—	—
power or natural gas	—	—	X	—	—
communications systems	—	—	X	—	—
water	—	—	X	—	X
sewer/storm water drainage	—	—	X	—	X
solid waste collection and disposal	—	—	X	—	X

Fire Protection: The project would increase the building area and the number of persons using the site. The introduction of residential use would increase the potential fire hazard over that of office use. The project would not require additional Fire Department personnel or equipment, except in the case of a major fire or disaster. Present hydrants and water supply are adequate./1/

Police Protection: The project would increase population and private property on the site, thus potentially increasing crime. The site is within the Central Police District (headquarters at 766 Vallejo St.). The project area is patrolled 24-hours a day by radio-dispatched patrol cars. There are no foot patrol beats in the area immediately surrounding the site. The nearest foot beat is about one block north of the site, on Columbus Ave. The Police Department does not expect to require additional police personnel or equipment to serve the project./2/ Appropriate design measures (alarms, adequate lighting at entryways, 24-hour security personnel, closed-circuit camera systems, secured and separate entrances for the residential areas with computerized lock systems) would reduce the demand for police personnel.

Schools: The project is not expected to house many families with school-aged children. San Francisco school system is currently losing student population and would be able to serve any additional students generated by the project./3/

Parks or other recreational facilities: The project would provide private and common open space and common recreational facilities for residents. This would include a health club and pool area. It is expected that project residents would be able to enjoy existing public parks in the vicinity as well as existing private recreational facilities. It is not anticipated that the project would generate excessive demand on parks and other recreational facilities.

Water: The project site is served by a 6-inch-diameter main located on the north side of Montgomery St. and an 8-inch-diameter main located on the west side. Both mains provide 72 pounds of static pressure and 61 pounds of working pressure. The project would increase water use at the site by approximately 32,000 gallons per day (gpd). Existing mains have sufficient capacity and pressure to handle the additional flow demand with hook-up from Montgomery St./4/

Sanitary Sewer: The site is serviced by rectangular, 3-ft. by 5-ft., combined storm and sanitary sewers located in both Montgomery and Washington Sts. The project would generate an estimated additional 32,000 gpd of wastewater. The sewers serving the site have sufficient capacity to carry the additional load, and no improvements are expected to be required.

Project-generated wastewater flows represent 0.05% of the average daily flows of 65 million gallons per day (MGD) currently being treated at the North Point Water Pollution Control Plant and would represent about 0.04% of the 85 to 90 MGD treatment capacity of the Southeast Water Pollution Control Plant when this facility goes into interim operation in 1982. Flows to the North Point plant, which currently serve the site, would be diverted to the Southeast plant at that time. North Point would then become a wet weather combined storm and sanitary sewage treatment facility. No expansion of the present collection and treatment system would be required to serve the project./5/

Solid Waste Disposal: When in operation, the project would generate about 2 tons of solid waste per day. Golden Gate Disposal Company, which currently serves the site, anticipates no problem in meeting collection demand./6/

#### NOTES - Utilities and Public Services

/1/ Chief Joseph A. Sullivan, Division of Support Services, San Francisco Fire Department, written communication, April 28, 1981.

/2/ Sergeant James Farrell, Division of Planning and Research, San Francisco Police Department, telephone communication, April 23, 1981.

/3/ Robert Haslam, Property Management Department, San Francisco Unified School District, telephone communication, September 15, 1981.

/4/ Mr. Harlow Swain, Senior District Water Serviceman, Engineering Department, San Francisco Water Department, telephone communication, April 24, 1981.

/5/ Mr Nathan Lee, Engineering Associate II, Division of Sewer System Design, San Francisco Clean Water Program, telephone communication, April 24, 1981. Mr. Don Hyashi, Director, Citizens Participation, San Francisco Clean Water Program, telephone communication, April 24, 1981.

/6/ Mr. Fiore Garbarino, Treasurer, Golden Gate Disposal Company, telephone communication, April 23, 1981.

## 8. Biology.

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Would there be a reduction in plant and/or animal habitat or interference with the movement of migratory fish or wildlife species?	___	___	<u>X</u>	___	___
b. Would the project affect the existence or habitat of any rare, endangered or unique species located on or near the site?	___	___	<u>X</u>	___	___
c. Would the project require removal of mature scenic trees?	___	___	<u>X</u>	___	___

## 9. Land. (topography, soils, geology) Would proposed project result in or be subject to:

a. Potentially hazardous geologic or soils conditions on or immediately adjoining the site? (slides, subsidence, erosion, and liquefaction)	___	___	<u>X</u>	___	<u>X</u>
b. Grading? (consider height, steepness and visibility of proposed slopes; consider effect of grading on trees and ridge tops)	___	___	<u>X</u>	___	___
c. Generation of substantial spoils during site preparation, grading, dredging or fill?	___	___	<u>X</u>	___	<u>X</u>

Analysis of site soils conditions has been completed by a geotechnical consultant./1/ The project sponsor would follow the recommendations of the geotechnical consultant in site development. Data indicate that the site is underlain by recent, unconsolidated deposits of clays, silts, sands and

combinations thereof. All these deposits are underlain by Franciscan bedrock material which is suitable for shallow building foundations such as spread footings or the concrete mat type proposed for the project. Grading would be limited to foundation preparation. The average depth of excavation would be about 20 ft.; the maximum depth of excavation would be about 25 ft.

Demolition of the existing structures and parking lot would result in the removal of used brick, concrete and pavement from the site.

#### NOTES - Land

/1/ Lee and Praszker, Consulting Civil Engineers, July 30, 1981, Geotechnical Investigation of the Montgomery - Washington Building.

10. Water. Would the proposed project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Reduction in the quality of surface water?	___	___	<u>X</u>	___	___
b. Change in runoff or alteration to drainage patterns?	___	___	<u>X</u>	___	___
c. Change in water use?	<u>X</u>	___	___	___	<u>X</u>
d. Change in quality of public water supply or in quality or quantity (dewatering) of groundwater?	___	<u>X</u>	___	___	<u>X</u>

On-site water consumption would increase by approximately 32,000 gallons per day. The vacant Lot 25, which is partially excavated and undrained, would drain into the City storm sewer system upon project completion. According to the geotechnical investigation prepared for the site, the depth of groundwater table is between elevation -2 and -7, San Francisco City Datum (SFCD)./1/ Elevation 0, SFCD, is 8.6 ft. above mean sea level. Project-related excavation would extend below groundwater level and dewatering would be required. Dewatering using sumps and pumps would be temporary and would take place during foundation preparation activities. Dewatering would be done inside the building excavation; no dewatering would occur outside of the excavation. Excessive drawdown of the groundwater level outside the excavation could produce some local subsidence which could damage the streets or older brick buildings in the immediate vicinity of the site. Water level outside the excavation would be monitored using groundwater observation

wells. Due to the sandy texture of subsurface deposits, the groundwater levels outside the excavation would not be appreciably lowered. The project would include measures which would mitigate potential impacts associated with excavation and dewatering activities (see p. 27).

NOTE - Water

/1/ Lee and Praszker, Consulting Civil Engineers, July 30, 1981, Geotechnical Investigation of the Montgomery - Washington Building.

11. Energy/Natural Resources. Would the proposed project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Any change in consumption of energy?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>X</u>
b. Substantial increase in demand on existing energy sources?	<u>    </u>	<u>    </u>	<u>X</u>	<u>    </u>	<u>X</u>
c. An effect on the potential use, extraction, conservation or depletion of a natural resource?	<u>    </u>	<u>X</u>	<u>    </u>	<u>    </u>	<u>X</u>

The project would result in a net increase in energy consumption on the site. The project would conform to energy requirements of Title 24 of the California Administrative Code, so that energy use per square foot of floor area would be less than at present. As the final building design has not been developed, the amount of total energy consumption and efficiency of energy uses cannot be identified. Energy consumption will be discussed in subsequent environmental documentation for the project as information becomes available.

There would be an increase in peak-hour electrical demand resulting from elevator use, in addition to peak-hour demand characteristics of other uses in the structure. Other aspects of electrical and natural gas demand characteristics cannot be identified until specific building designs are developed. The project would contribute to cumulative energy consumption by Downtown development that will result in depletion of nonrenewable energy resources.

The possibility that shadows from the project could reduce the feasibility of future active solar energy collection installations in some off-site locations will be studied in subsequent environmental documentation for the project. No

existing active solar energy collection installations would be affected, as none are located in the immediate area, north of the site. No other natural energy resources would be directly affected.

12. Hazards. Would the proposed project result in:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Increased risk of explosion or release of hazardous substances (e.g., oil, pesticides, chemicals or radiation), in the event of an accident, or cause other dangers to public health and safety?	___	___	<u>X</u>	___	___
b. Creation of or exposure to a potential health hazard?	___	___	<u>X</u>	___	___
c. Possible interference with an emergency response plan or emergency evacuation plan?	___	___	<u>X</u>	___	___

13. Cultural. Would the proposed project:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
a. Include or affect a historic site, structure or building?	___	<u>X</u>	___	___	<u>X</u>
b. Include or affect a known archaeological resource or an area of archaeological resource potential?	___	___	<u>X</u>	___	___
c. Cause a physical change affecting unique ethnic or cultural values?	___	___	<u>X</u>	___	<u>X</u>

No known buried ships or other archaeological resources occur on the site, which is presently occupied by two structures. The site is inland of the 1849 shoreline (see p. 29 for mitigation in the event of an archaeological finding on the site).

The project would result in the removal of the two existing buildings on the site. The two-story building housing the Lafayette Restaurant and offices at 643 Montgomery St. was rated "C"--of "Contextual Importance" in the architectural survey conducted for the Foundation for San Francisco's Architectural Heritage by Charles Hall Page & Associates, Inc. The structure is listed in the Foundation's publication, Splendid Survivors. It is not, however, included in the City's official list of Architecturally and/or

Historically Significant Buildings in the Downtown, adopted by the City Planning Commission on May 29, 1980. The structure was completed in 1908 and is part of the series of post-1906 reconstruction brick buildings which are diminishing in number throughout the Downtown. The northwest portion of Lot 4, currently used as a surface parking lot, is a State Historic site. The site formerly contained the Bolton & Barron Building, listed in the California Historic American Building Survey (HABS).

The one-story building at 639 Montgomery St., occupied by the Iron Pot Restaurant, is not rated in either architectural survey. The restaurant was, however, a site of bohemian cultural activity during the 1940's and early 1950's related to the so-called Montgomery Block. The Montgomery Block, residence of many artists during the period, is now occupied by the Transamerica pyramid building.

The Jackson Square Historic District, which encompasses an area bounded by Washington St., Pacific St., Columbus Ave. and Sansome St. lies north and northeast of the project site. In 1972, this area was made San Francisco's first historic district in recognition of its special architectural and aesthetic character. Once the northern edge of San Francisco's business district, land use in this area changed when the downtown shifted south in the late 1860's. The Jackson Square District went from banking, retail and professional uses to liquor and tobacco warehousing, and later to printing and paper warehousing. In the 1950's the vintage red-brick and Victorian buildings were refurbished and occupied by interior decorators and wholesalers. By the late 1960's professional firms, and many restaurant and bars relocated from the Financial District had occupied the area, raising rents to their current level. Today Jackson Square has some of the most elaborate surviving Victorian commercial buildings in San Francisco, many of which are included in the City's official list of Architecturally and/or Historically Significant Buildings in the Downtown. For example, the original Transamerica Corporation Building is located on the corner between Columbus Ave. and Montgomery St., north of the project site across Columbus Ave.

The project site is within a few blocks of several architecturally significant buildings in the Financial District. The Kohl Building at 400 Montgomery St., the Financial Center Building at 405 Montgomery St., the Anton Boreland

Company Bank at 440 Montgomery St., and the original Bank of America Building at 552 Montgomery St. were rated "A" for "highest architectural importance" in the survey conducted for the Foundation for San Francisco's Architectural Heritage. (The Kohl Building, The Anton Boreland Company Bank and the original Bank of America Building were rated "4" in the City's official list of Architecturally and/or Historically Significant Buildings; the 405 Montgomery St. building was not rated in this survey.) The American-Asian Bank at 500 Montgomery St. and the building at 520 Montgomery were rated "B" for "major architectural importance" in the the Heritage survey. (The American-Asian Bank was rated 4/5 in the City's official list; the 520 Montgomery St. building was not rated in this survey.) The Old Subtreasury Building at 608-610 Commercial St is designated City Landmark No. 34 and was rated 3 in the City's official list.

Directly south of the project site, is a California registered hisorical landmark. The 601 Montgomery St. Building is located on the original site of the Western Regional Headquarters of the Russsell, Majors and Waddell Company. This firm, which had its main office in Leavenworth, Kansas, founded the Pony Express and conducted operations in San Francisco from 1860 to 1861. There are six plaques on the 601 Montgomery St. property from organizations commemorating that site's history.

The project site is located within the Downtown Financial District (C-3-0) and is not immediately adjacent to the Chinatown community. The project would be expected to have no measurable effect on the Chinese Cultural Center located in the Holiday Inn. Therefore, the project would not affect the unique ethnic or cultural values of this community.

#### C. MITIGATION MEASURES:

	<u>Yes</u>	<u>No</u>	<u>Disc.</u>
Are mitigation measures included in the project?	<u>X</u>	<u>  </u>	<u>X</u>
Are other mitigation measures available?	<u>maybe, if need is</u> <u>identified in</u> <u>subsequent environmental</u> <u>documentation.</u>		

Mitigation Measures proposed as part of the project include the following:

## URBAN DESIGN

- The project's sculptured upper-level facade is intended by the architect to (1) reduce the apparent scale and bulk of the building; (2) provide visual interest to viewers from Telegraph Hill and the Jackson Square District; and (3) serve as an apparent transition in height from the taller high-rise buildings of the C-3-0 district which frame the project to the low-rise structures of the Jackson Square District, north and northeast of the site.
- The project would include pedestrian amenities; small, pedestrian-scale retail activity; and sidewalk space designed to improve pedestrian access to work, shopping and passive recreation spaces and transit facilities as well as contribute to a visually interesting streetscape. Proposed pedestrian amenities include street trees and sidewalk plantings, multiple building entrances, widened sidewalks and ground-floor commercial activity. Ground-floor commercial activity would include uses such as a kiosk flower stand, newsstand, automatic banking terminal and other "soft" retail space, and would not include any financial institutions.

## POPULATION/EMPLOYMENT/HOUSING

- The project sponsor would assist any of the existing tenants on the project site in relocation activities.
- The project sponsor proposes to provide approximately 40 residential condominium units on-site. These units would vary from 1,000 to 2,500 sq. ft. providing a range in size. Project housing would help mitigate increased demands on the city's housing supply which may be generated by the project's office development.

## TRANSPORTATION/CIRCULATION

- The project sponsor would encourage transit use through the sale on-site of BART and MUNI passes to employees, and by encouraging employee carpool and vanpool systems in cooperation with RIDES for Bay Area commuters.

- Secure bicycle parking facilities would be provided, to encourage the use of bicycles by employees and messengers.
- During the construction period, project truck movement would be limited to the hours between 9 A.M. and 4 P.M., to minimize peak-hour traffic conflicts.
- The project sponsor would participate proportionately in whatever legal means is finally adopted by the Board of Supervisors to contribute funds for an established Downtown transit assessment district to meet peak demands caused by cumulative office development in the Downtown.

#### NOISE

- Prior to construction, the project sponsor would meet with the Holiday Inn management to negotiate arrangements for hotel guests who will sleep during the daytime to be assigned hotel rooms located farthest from the construction site and noise sources. Additional measures would be arranged as necessary and feasible for hotel and adjacent office uses.
- The project would comply with Title 25 of the California Administrative Code regarding noise insulation for residential uses.
- The project contractor would comply with all requirements of the San Francisco Noise Ordinance, including limiting noise emissions from powered construction equipment to 80 dBA at a distance of 100 ft. The project contractor would muffle and shield intakes and exhausts, shroud or shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible. There would be no pile driving.

#### AIR QUALITY/CLIMATE

- During excavation, unpaved demolition and construction areas would be wetted to hold down dust; if this were done at least twice a day with complete coverage, particulate emissions (dust) would be reduced about 50%.

- The general contractor would maintain and operate construction equipment in such a way as to minimize exhaust emissions. During construction, trucks in loading or unloading queues would be kept with their engines off when not in use to reduce vehicle emissions.
- Residential open space would be designed and sheltered to maximize natural light and air and minimize wind on-site. Should the results of a detailed wind analysis indicate that the project would have substantial wind effects, design alternatives would be considered to mitigate wind effects.

#### UTILITIES AND PUBLIC SERVICES

- To reduce the demand on police protection services, the project would incorporate internal security measures such as a 24-hour staffed guard station in the lobby area; closed circuit television cameras and internal security personnel; well-lighted entries; alarm systems; separate security elevator and locked entrances with telephones for the residential portion of the building; and computerized office and residential entrances accessible only by pre-programmed magnetic keys.
- The project would incorporate all emergency response systems stipulated by the Life Safety Code, including fire alarms, an emergency communication system, an emergency power supply and an on-site emergency water supply. These measures would reduce hazards to building occupants during an earthquake or fire.
- The project would incorporate low-flow faucet and toilet fixtures to reduce water consumption and wastewater.
- The building would be equipped with a trash compactor to reduce the volume of solid waste requiring storage and transport. Separate storage facilities for recyclable waste material would be provided for both office and residential uses.

## LAND (Topography, Soils, Geology)

- A detailed foundation and structural design study has been conducted for the building by a California licensed structural engineer and a geotechnical consultant. The project sponsor would follow the recommendations of these studies during the final design and construction of the project.
- The project sponsor would post a surety bond, if required by the San Francisco Department of Public Works, before issuance of a permit to excavate. Such a bond would protect the City against damages to City-owned sidewalks, streets and utilities.
- The project sponsor would require the project contractor and sub-contractors to obtain a Faithful Performance and Payment Bond, if proper financial capability is not evident, and to be responsible for any damage to existing buildings which might result from excavation. This bond would protect the project sponsor and owners of adjacent properties if any damage to these properties were to result from construction activities.
- Excavation pit walls would be shored up and protected from slumping or lateral movement of soils into the pit. Shoring and sheeting with soldier beams could be used for this purpose. The contractor would comply with the Excavation Standards of the California Occupational Safety and Health Agency (Department of Industrial Relations).
- Montgomery, Washington and Merchant Sts. would be mechanically swept by the demolition and excavation contractors, as required by the San Francisco Building Code, so that silt would not be washed into the storm drains and dust would be reduced. This would be a provision of excavation and demolition contracts.
- Groundwater observation wells would be installed for monitoring the level of the water table and other instruments to monitor potential settlement and subsidence. The City would require a lateral and settlement survey to monitor any movement or settlement of surrounding buildings and adjacent streets during the dewatering. Control lines and benchmarks would be

established for monitoring horizontal and vertical movement. Costs for the survey and any necessary repairs to services under the streets would be borne by the contractor.

- If, in the judgment of City engineers, unacceptable subsidence occurs during the construction, groundwater recharge would be begun to halt the settlement. This might cause a delay in construction.
- Groundwater pumped from the site would be retained in a holding tank to allow suspended particles to settle, if this is found necessary by the Industrial Waste Division of the Department of Public Works, to prevent sediment from entering the storm drain/sewer lines.

## ENERGY

- Wherever possible, office suites would be equipped with individual light switches, time clock operation and fluorescent lights, to conserve electric energy. A centralized management computer system would monitor off-hour (evening and weekend) heating and air-conditioning use. Tenants would be charged for off-hour heating and air-conditioning service used to promote energy conservation.
- The project would comply with the former Federal Energy Building Temperature Restrictions in the operation of heating, ventilating and air conditioning (HVAC) equipment. The HVAC system would be equipped with an economizer cycle to use outside air for cooling, as feasible.
- Whenever possible, the HVAC system would be designed to recycle waste heat to heat the project swimming pool, domestic water for office use and recreation facility water supply.
- Residential units would have individually metered gas (if applicable) and electric services.
- Residential and office water heating systems would be insulated to minimize heat loss. In residential units, water heaters would be placed as close as possible to the source of use (sinks, showers, dishwashers) to minimize heat loss.

## CULTURAL

- Should evidence of cultural or historic artifacts of significance be found during project excavation, the Environmental Review Officer and the President of the Landmarks Preservation Advisory Board would be notified. The project sponsor would select an archaeologist to help the Office of Environmental Review determine the significance of the find and whether feasible measures, including appropriate security measures, should be implemented to preserve or recover such artifacts. The Environmental Review Officer would then recommend specific mitigation measures, if necessary, and recommendations would be sent to the State Office of Historic Preservation. Excavation or construction which might damage the discovered cultural resources would be suspended for a maximum of four weeks to permit inspection, recommendation and retrieval, if appropriate.
- The project sponsor would install a plaque on the project site to commemorate the history of the Bolton & Barron Building, listed in the California Historic American Building Survey.

### D. ALTERNATIVES:

Yes    No    Disc.

Were other alternatives considered:

  X                X  

The project sponsor is considering two alternatives to the proposed project. Alternative project plans include:

1. A 215-ft. high (14:1 FAR) office building on the currently proposed project site (17,400 sq. ft.). This alternative would not include housing and would not require a conditional use authorization allowing for residential floor area bonuses;
2. An office/condominium building on a smaller 12,580 sq. ft. site, which excludes the presently City-owned Lot 25. This alternative would be about 270 ft. in height with an FAR of 14:1 for the office portion of the building. Allowable bonuses would be applied for residential use on the site;

3. An office/condominium building which would comply with all development controls recommended in the Department of City Planning document, Guiding Downtown Development. This alternative would involve development on the four parcels comprising the project site. Office space would represent an FAR of 12:1; residential use would represent an FAR of 5:1; and
4. The no project alternative. This alternative would retain the existing structures on the project site.

E. MANDATORY FINDINGS OF SIGNIFICANCE:

- |                                                                                                                                                                                                                                                                                                                                                                | Yes          | No           | Disc.        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|--------------|--------------|
| 1. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal, or eliminate important examples of the major periods of California history or prehistory? | _____        | <u>  X  </u> | _____        |
| 2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?                                                                                                                                                                                                                                           | <u>  X  </u> | _____        | _____        |
| 3. Does the project have possible environmental effects which are individually limited, but cumulatively considerable?                                                                                                                                                                                                                                         | <u>  X  </u> | _____        | <u>  X  </u> |
| 4. Would the project cause substantial adverse effects on human beings, either directly or indirectly?                                                                                                                                                                                                                                                         | _____        | <u>  X  </u> | _____        |

5. Is there a serious public controversy concerning the possible environmental effect of the project?

Yes No Disc.

         X     X  

The project would provide mixed-use but could permanently change the physical interface between the Financial District, Chinatown, North Beach and Jackson Square areas. This will be considered in further environmental documentation for the project. The project would contribute to cumulative traffic increase in the downtown. Some concern has been expressed about the effect of project design on the surrounding area and that there be adequate transfer of public open space from the site Lot 25 to the Chinatown area. These concerns will be considered in subsequent environmental documentation for the project.

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## APPENDIX B: WIND-TUNNEL STUDY

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### MONTGOMERY-WASHINGTON BUILDING

#### I. MODEL AND WIND TUNNEL FACILITIES

##### Model

A 1/50 scaled model of the downtown San Francisco area bounded by Pacific Avenue on the north, Sacramento Street on the south, Stockton Street on the east, and Sansome Street on the west was provided by ESA, Inc. The model was capable of having three configurations (the existing setting, the proposed project and an alternative design) available for separate wind-tunnel testing.

##### Wind Tunnel Facilities

The University of California at Davis environmental wind tunnel was built for testing natural atmospheric boundary layer flows past surface objects such as buildings and other structures. The tunnel has an overall length of 22 meters (m) (72 ft.), a test section of 1.22 m (4 ft.) wide by 1.83 m (6 ft.) high and has an adjustable false ceiling. Wind speeds within the tunnel can be varied from 1 to 4 meters per second (m/s) or 4.8 to 19.3 miles per hour (mph).

The atmospheric boundary layer flow over the downtown area was simulated by an upwind network of turbulence generators. The wind tunnel's false ceiling was adjusted to provide a zero-pressure-gradient downstream flow. The adjustment of the flow to zero-pressure-gradient flow is known to properly model atmospheric boundary layers near the surface of the earth. The long flow development length allows a naturally turbulent boundary layer to develop and accurately models the full-scale flow.

## II. TESTING PROCEDURE

The wind study was divided into two parts: flow visualization and wind-speed measurements. The flow visualization observations were performed by injecting a continuous stream of smoke at various surface locations. The subsequent motion of the smoke was recorded and prevailing wind directions determined. Wind-speed measurements were made at 13 surface locations using a hot-wire anemometer, an instrument that directly relates rates of heat transfer by electronic signals. The hot-wire signals are proportional to the magnitude and steadiness of the wind. Both the mean wind speeds and corresponding turbulent intensities were measured. Thus high wind speeds and gustiness (large variable changes in wind speeds over short changes in time) could be detected. Hot-wire measurements made close the surface have an inherent uncertainty of  $\pm 5\%$  of the true values.

Calibration measurements were made before and after each series of hot-wire experiments. The calibration was accomplished by means of a Thermo-System Incorporation (TSI) Model #1126 hot-wire anemometer calibrator especially designed for low wind speeds. The calibration is accurate to  $\pm 1\%$ . The flow above the model was adjusted to the same wind speed of 3.67 m/s (12 ft/sec or 8.2 mph) for all experiments. The ratio of near surface speed to freestream wind speed was calculated from the hot-wire measurements and is presented on the attached figures.

Experiments were performed for two prevailing wind directions, west and northwest for the existing setting, proposed project and Alternative Five design. These wind conditions are the most common in San Francisco, and are therefore the most representative for evaluation purposes. All hot-wire measurements were taken at the same series of surface points around the building site for both wind directions and the three building settings.

## III. TEST RESULTS AND DISCUSSION

The measured wind speeds are expressed as percentage of the freestream wind tunnel speed. The numerical ratios displayed on the figures can be

approximately interpreted by using the following scale presented in Table I. The assessment of wind impact on the surrounding settings is preliminary and should be construed only as an estimate of the projected actual wind environment. The scale presented in Table I is subjective.

TABLE I: RELATIVE INTENSITY OF SURFACE WINDS

<u>Intensity of Wind Speed</u>	<u>Percentage of Freestream Speed</u>
Low	0 - 19
Moderately low	20 - 29
Moderate	30 - 49
Moderately high	50 - 69
High	70 - 100
Very high	over 100

It should be noted that the plotted values are not actual wind speeds but ratios. Thus a point having "very high" wind speed could still experience light winds on a near-calm day. Likewise, a point found to have "low" wind speed could experience relatively high winds on a windy day.

#### Northwest Wind

- (i) Setting. Existing wind speeds at the site are generally low to moderate, varying in the measured speed ratios from 0.19 to 0.48, the majority are less than 0.30. There is a gusty corner at the intersection of Columbus Avenue, Washington and Montgomery Streets. There is a moderate wind along Washington Street. There are strong vertical vortices formed off of both the north and south downstream edges of the Transamerica Pyramid, creating turbulence at the Redwood park, east of the Pyramid, and a mild street level vortex on Kearny Street between Jackson and Washington Streets.
- (ii) Impact of project. The existing wind environment would be worsened by the project in four ways: (a) Moderately high winds (speed ratio of 0.58, an increase of about 160 percent from existing conditions) would prevail on Montgomery Street east of the project; (b) there would be a

30% increase in wind speed on Washington Street north of the project; (c) the intersection of Columbus Avenue, Washington and Montgomery Streets would experience an increase in wind speed of more than double existing conditions; and (d) an increased wind flow would occur at the intersection of Montgomery and Merchant Streets. Another change would be an increase of wind strength on the adjacent west side of the Holiday Inn building. There would be moderate, steady cross flow at the northeast corner of the project under the covered walkways. Decreased wind impacts would occur as follows: (a) flow at the intersection of Clay and Montgomery Streets would be reduced from 0.48 to 0.38 and would not be as gusty as it is now; and (b) the street-level vortex on Kearny Street would disappear.

There would be a recirculation zone from the downstream edge of the Holiday Inn building that would create a turbulent vortex in the area of the proposed swimming pool. A windscreen was tested on the model and minimized the recirculation zone in the wake region substantially.

- (iii) The Guiding Downtown Development Alternative (Alternative Five) would have essentially the same flow as the project except the moderately high wind (0.58) on Montgomery Street would be reduced to moderate winds (0.38), and flow north and northeast of the project would be reduced 28%. There would be increased street level turbulence at the intersection of Merchant and Clay Streets with Montgomery Street.

#### West Wind

- (i) Setting. Wind speeds at the project site are generally low to moderate, varying in the ratios from 0.13 to 0.46. There is a higher level of turbulent wind at the intersection of Columbus Avenue, Washington and Montgomery Streets; however, it is not as severe as for a northwest wind. There is a border line moderate to moderately high wind on Washington Street directly north of the Transamerica Pyramid. Strong vertical vortices are formed off both north and south downstream edges of the Transamerica Pyramid, creating turbulence at the Redwood park, east of the Pyramid. All other flow features are not undesirable.

- (ii) Impact of project. The project would cause changes in the wind flow near the site in the following manner: (a) North of the proposed building there would be a region of flow recirculation creating an undesirable surface condition. There would be a 14% increase in wind speed. It would be an undesirable wind changing over short periods of time (near the northeast corner of the proposed building). Also, rapid changes in wind directions over short distances would occur directly north (at the mid-streetwise length) of the proposed building, causing pedestrian discomfort. (b) There would be a higher level of turbulence on Washington Street north of the Transamerica Pyramid. However, the mean wind speed would be generally less than the under existing conditions, thus minimizing the turbulent effect. (c) Directly east of the proposed building there would be increased street-level turbulence and gustiness of winds. It would be periodic and conceivably change over short distances under the covered walkways and is highly undesirable.

The remainder of the flow environment is essentially the same existing conditions.

There is a strong recirculation zone shed downstream from the Holiday Inn building that creates high levels of turbulence in the area of the proposed pool. A windscreen was tested and it minimizes the recirculation zone in the wake region.

- (iii) The Guiding Downtown Development Alternative (Alternative Five) would be different than the project wind environment in the following manner: (a) There would be a moderate wind flow directly north of the proposed building. Thus the recirculation zone north of the proposed building would be eliminated. The area of rapid change of flow direction would vanish and (b) There would be no vertical vortices shed from the north and south downstream edges of the Transamerica Pyramid.

### III. MITIGATION MEASURES

There are two types of mitigating measures to reduce windspeeds. the first involves major design changes to reduce surface winds near the project such as different building orientations or changes in size or shape. This type of mitigation was not considered in the wind tunnel study.

The second type of mitigation measure involves additions to the project that would provide local shelter for pedestrians. Small structures such as street trees and other vegetation could function as windbreaks.

Generally, the presence of the proposed building would not alter the existing west wind environment, except directly north and possibly east of the proposed building. Enclosure of the undercover walkway area, such as street-side glass walls, vegetation or other street-side screening, would provide pedestrian protection and may eliminate the project's recirculating flow problem by modifying the flow environment similar to that of the Alternative. Also rows of street trees along Montgomery Street between Washington and Merchant Street would help minimize the turbulence and gustiness.

The proposed building subjected to northwest wind would generally worsen conditions along Montgomery Street between Washington and Clay Streets. In order to significantly improve wind conditions along Montgomery Street a major windbreak would be required along the street. This could only be accomplished by drastically altering the proposed and alternate building designs. The second type of mitigation (as stated in the above paragraph) would only minimize the moderately high northwesterly winds on Montgomery Street.

NOTE: The following Figures show wind flow patterns and wind speed ratios for existing conditions, the proposed project, and Alternative Five. These diagrams are based on the wind tunnel tests; the indications of wind flow intensities (such as "strong" and "weak") are qualitative measures of smoke flow patterns in the wind tunnel chamber.

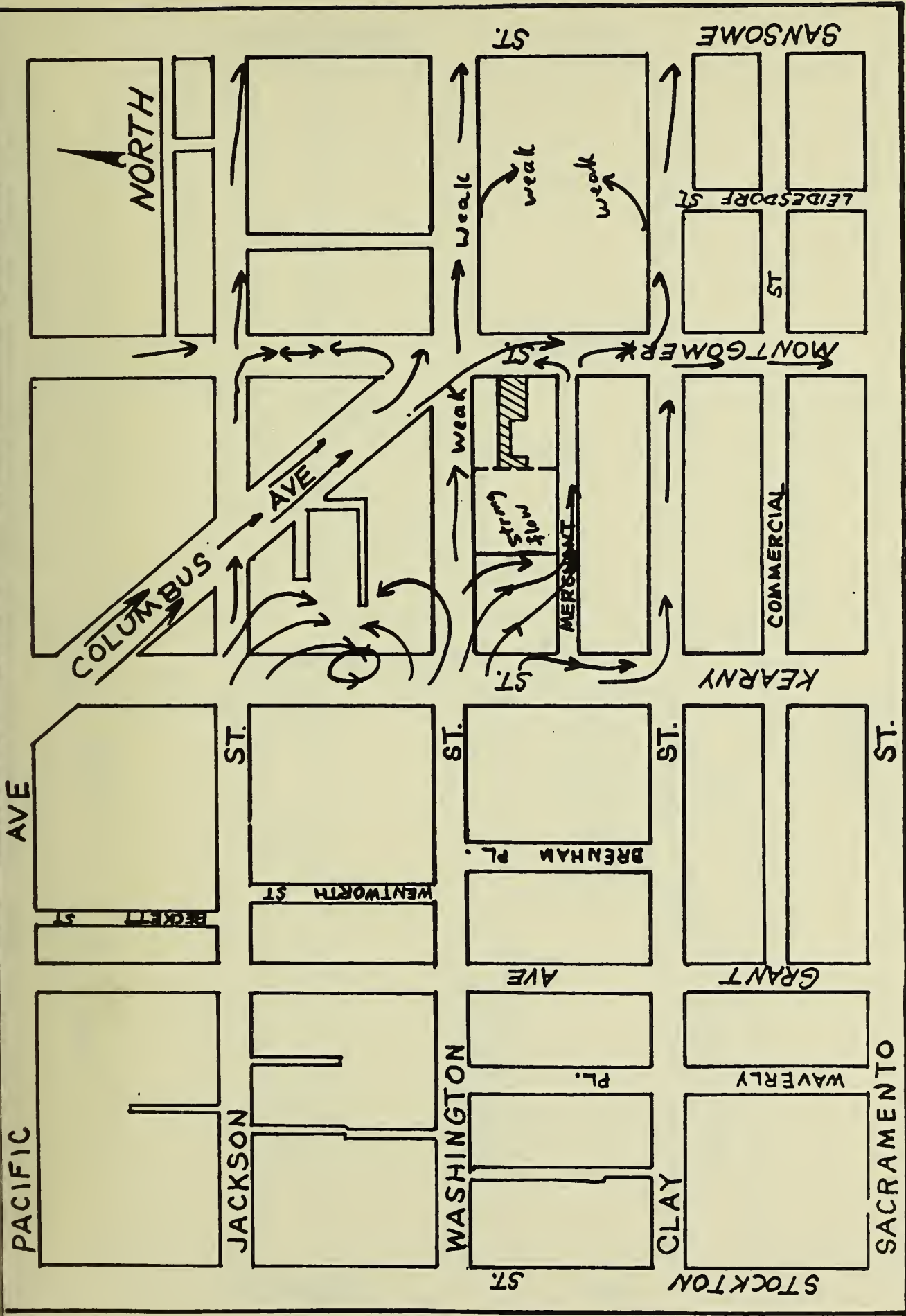


FIGURE B1: WIND FLOWS FOR NORTHWEST WIND - EXISTING CONDITIONS

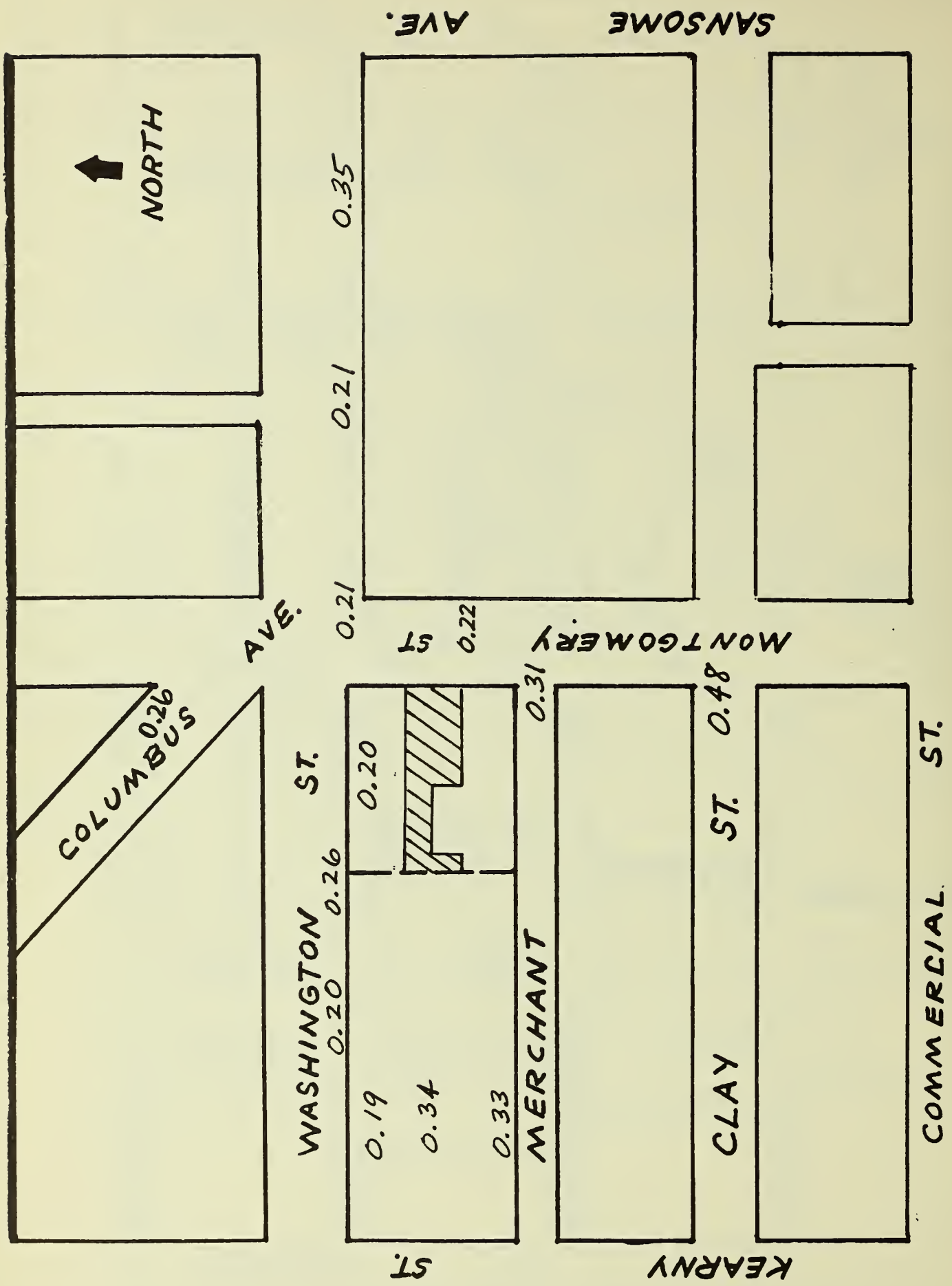


FIGURE B2: WIND SPEED RATIOS FOR NORTHWEST WIND - EXISTING CONDITIONS

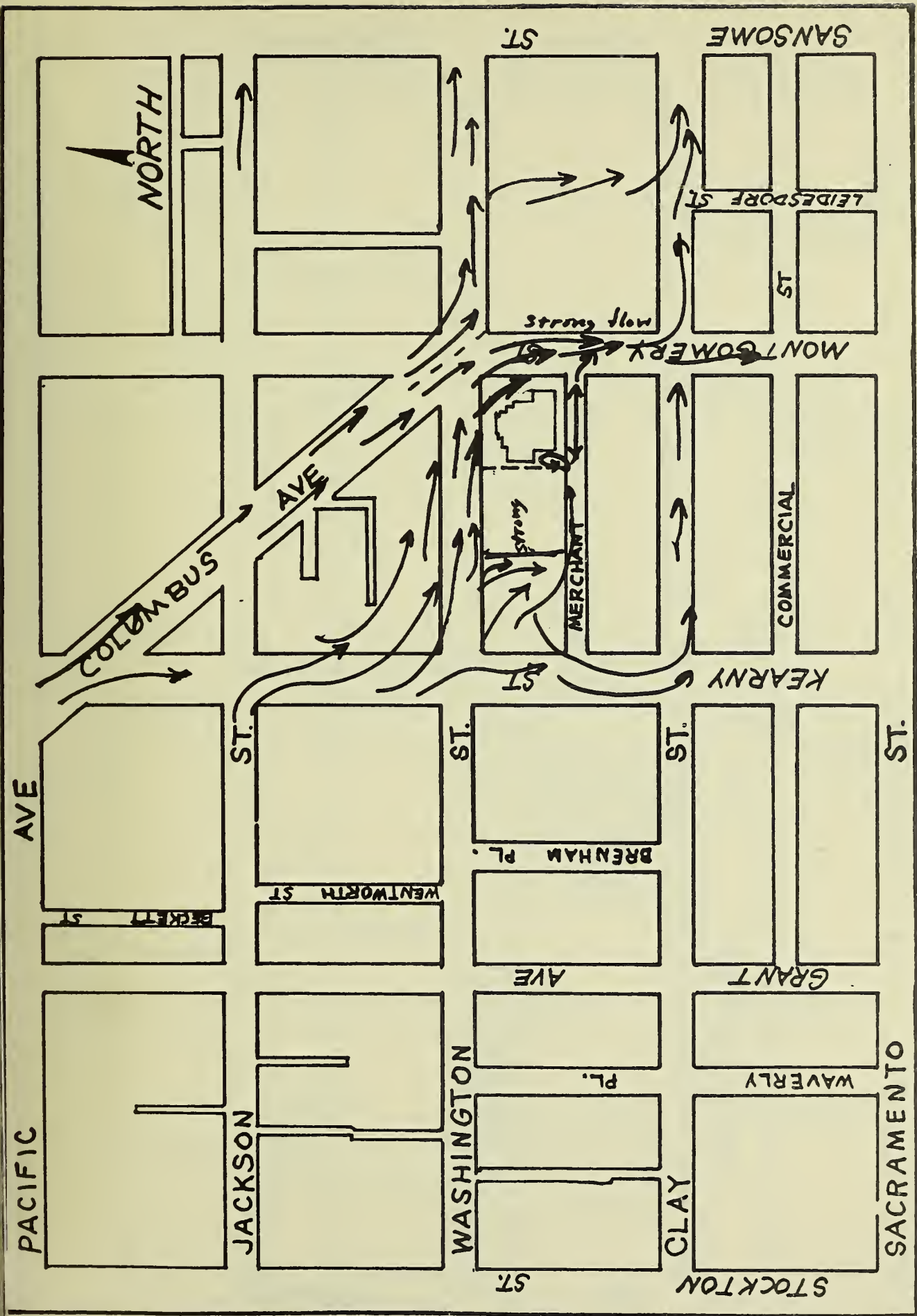


FIGURE B3: WIND FLOWS FOR NORTHWEST WIND - PROJECT

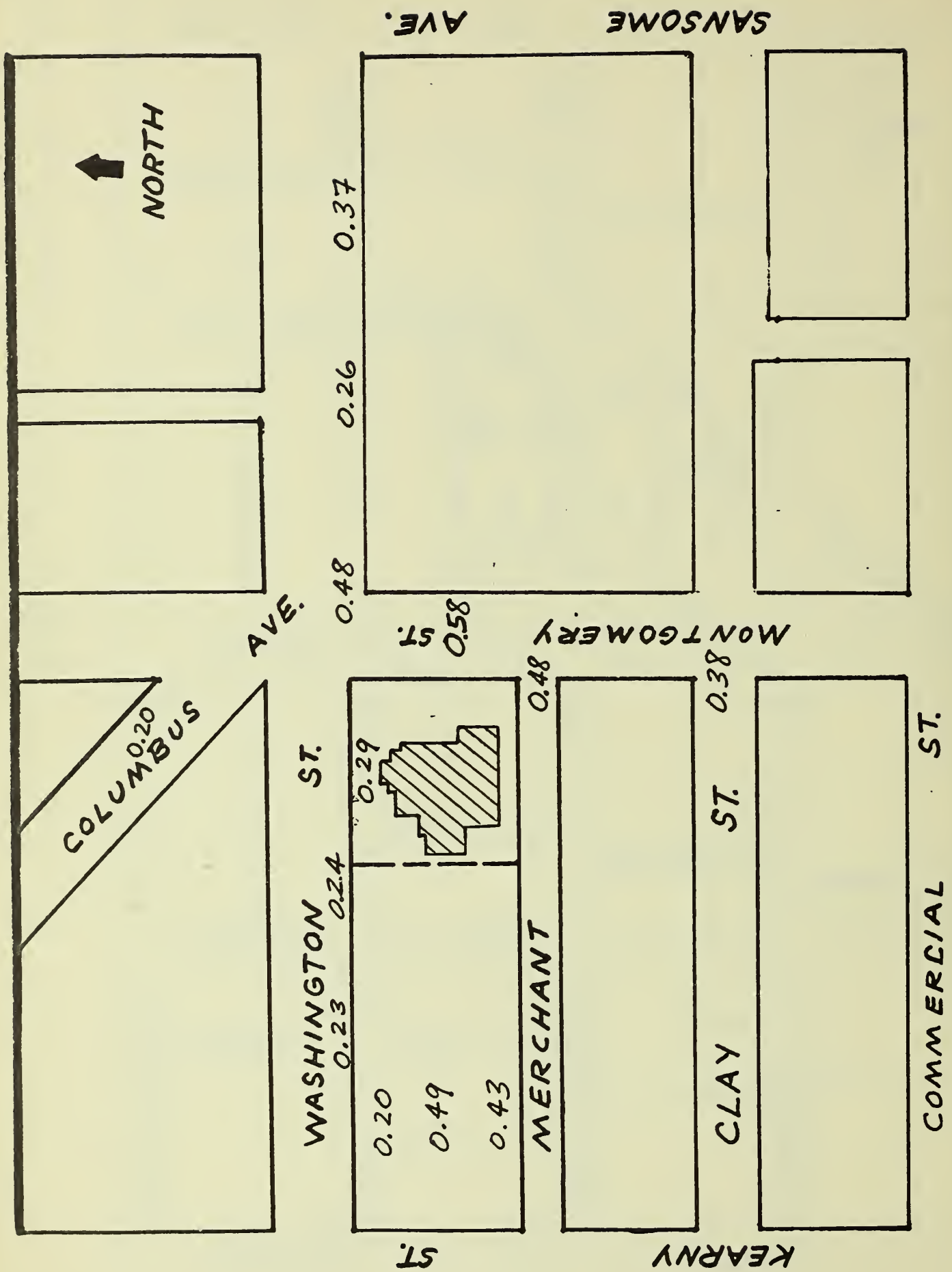


FIGURE B4: WIND SPEED RATIOS FOR NORTHWEST WIND - PROJECT

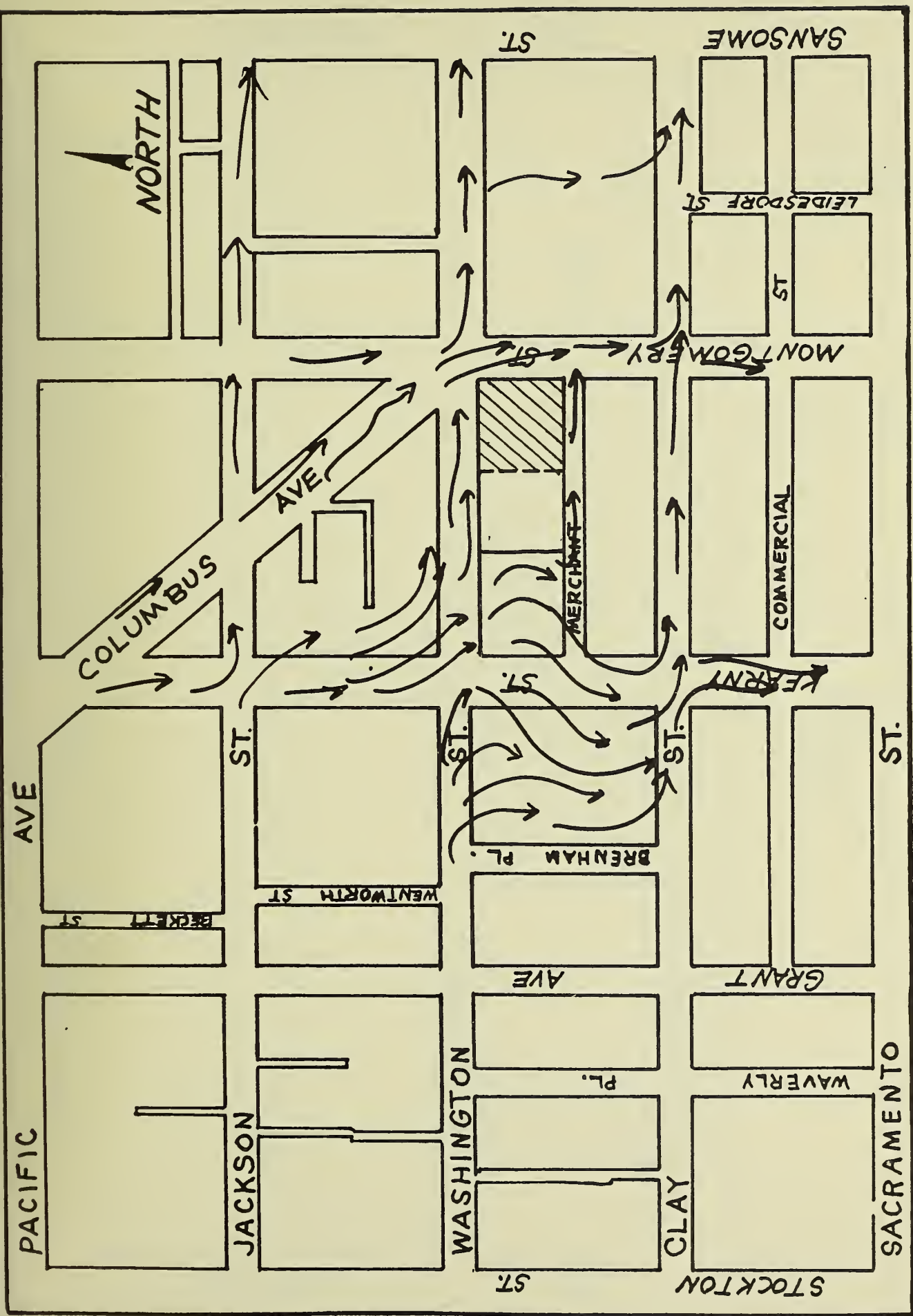


FIGURE B5: WIND FLOWS FOR NORTHWEST WIND - ALTERNATIVE 5

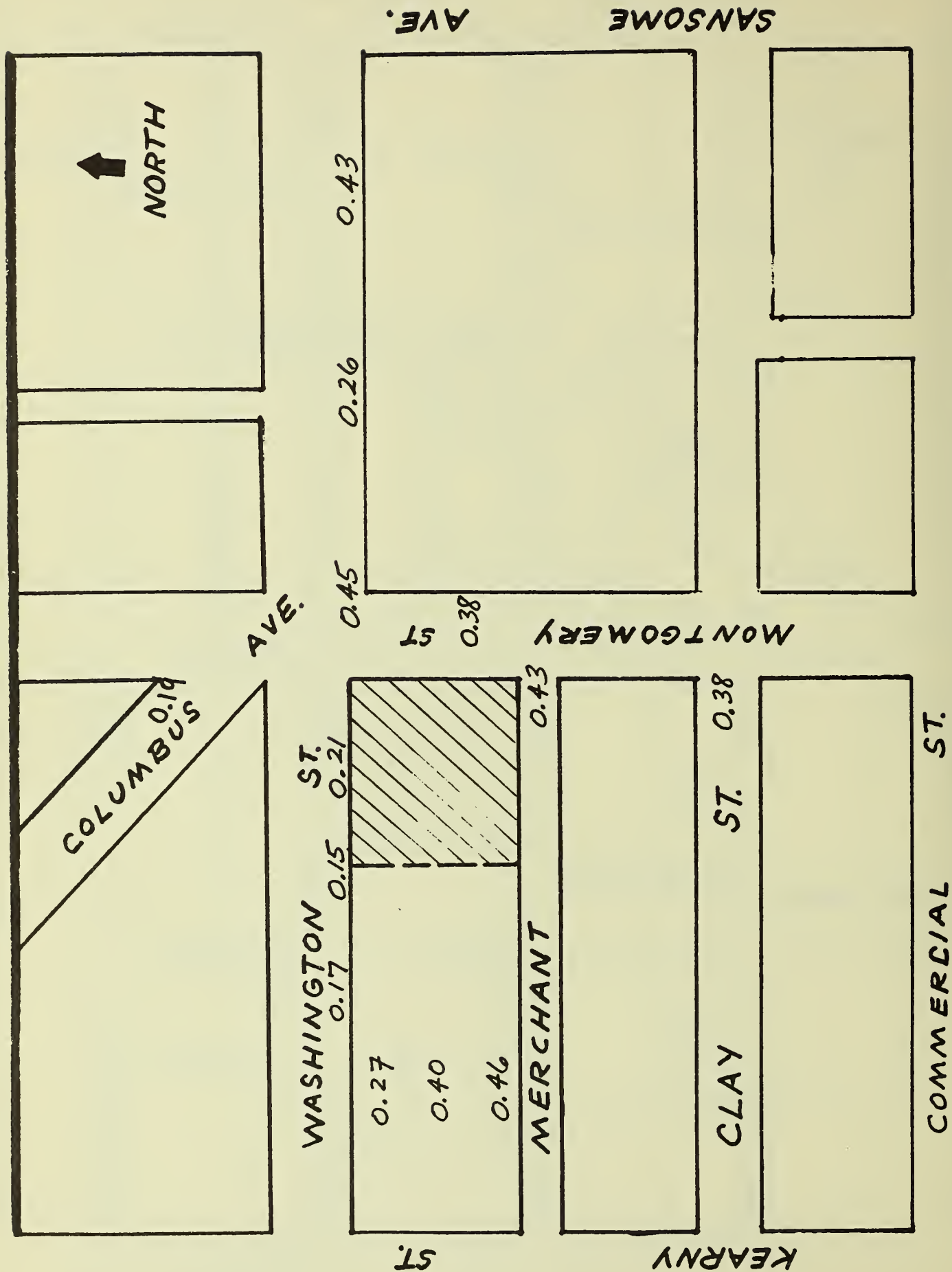


FIGURE B6: WIND SPEED RATIOS FOR NORTHWEST WIND - ALTERNATIVE 5

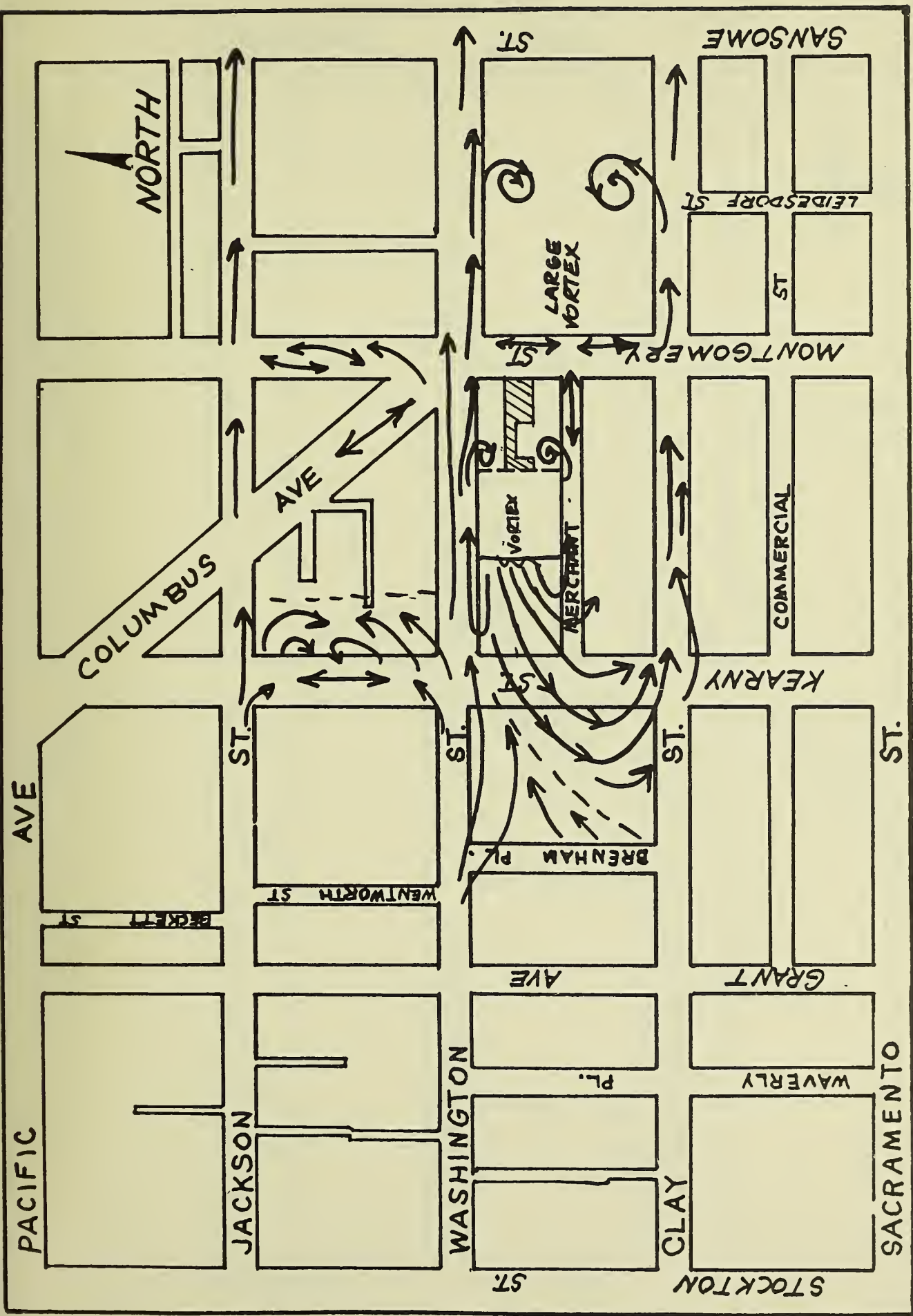


FIGURE B7: WIND FLOWS FOR WESTERLY WIND - EXISTING CONDITIONS

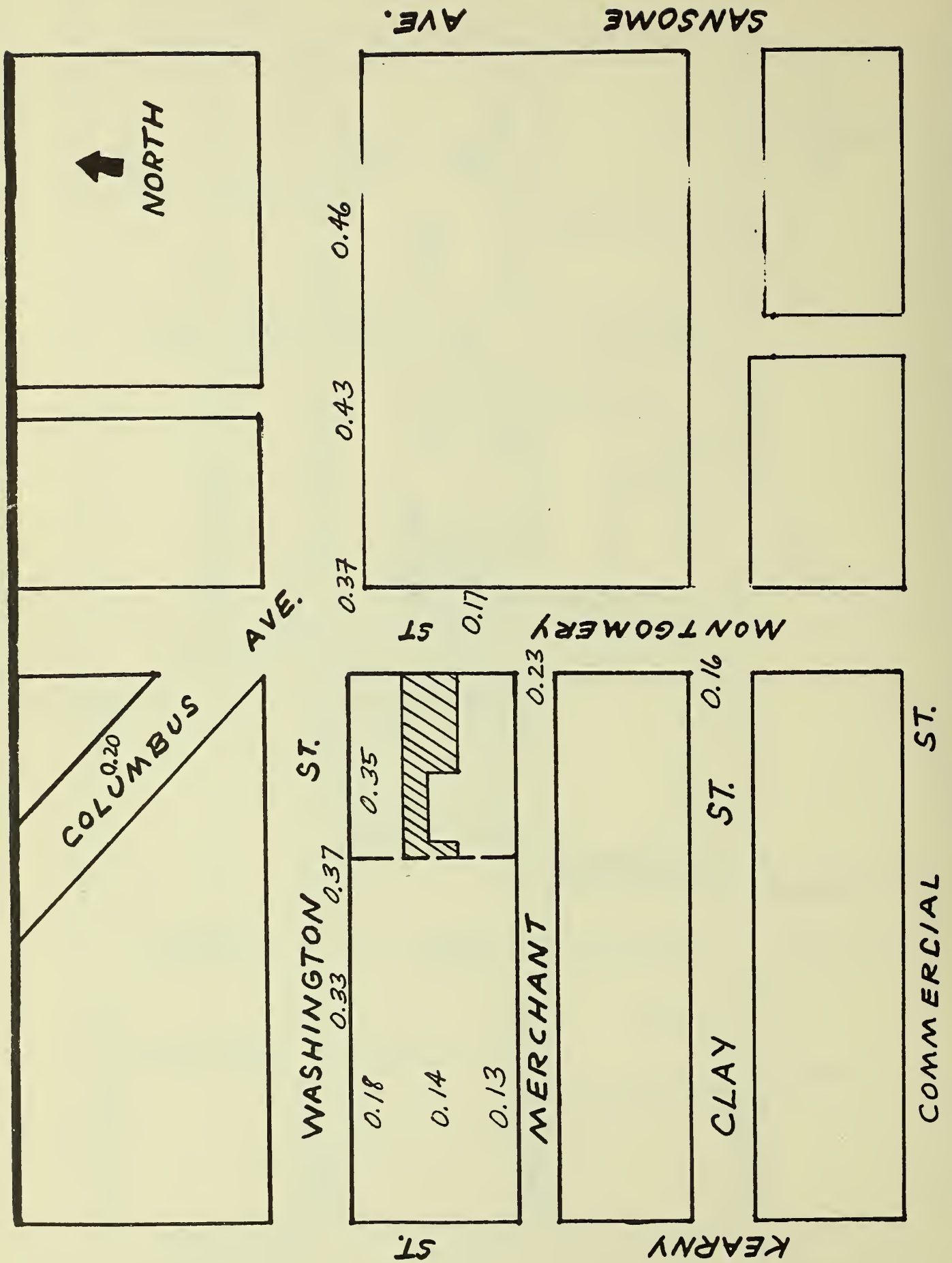


FIGURE B8: WIND SPEED RATIOS FOR WESTERLY WIND - EXISTING CONDITIONS

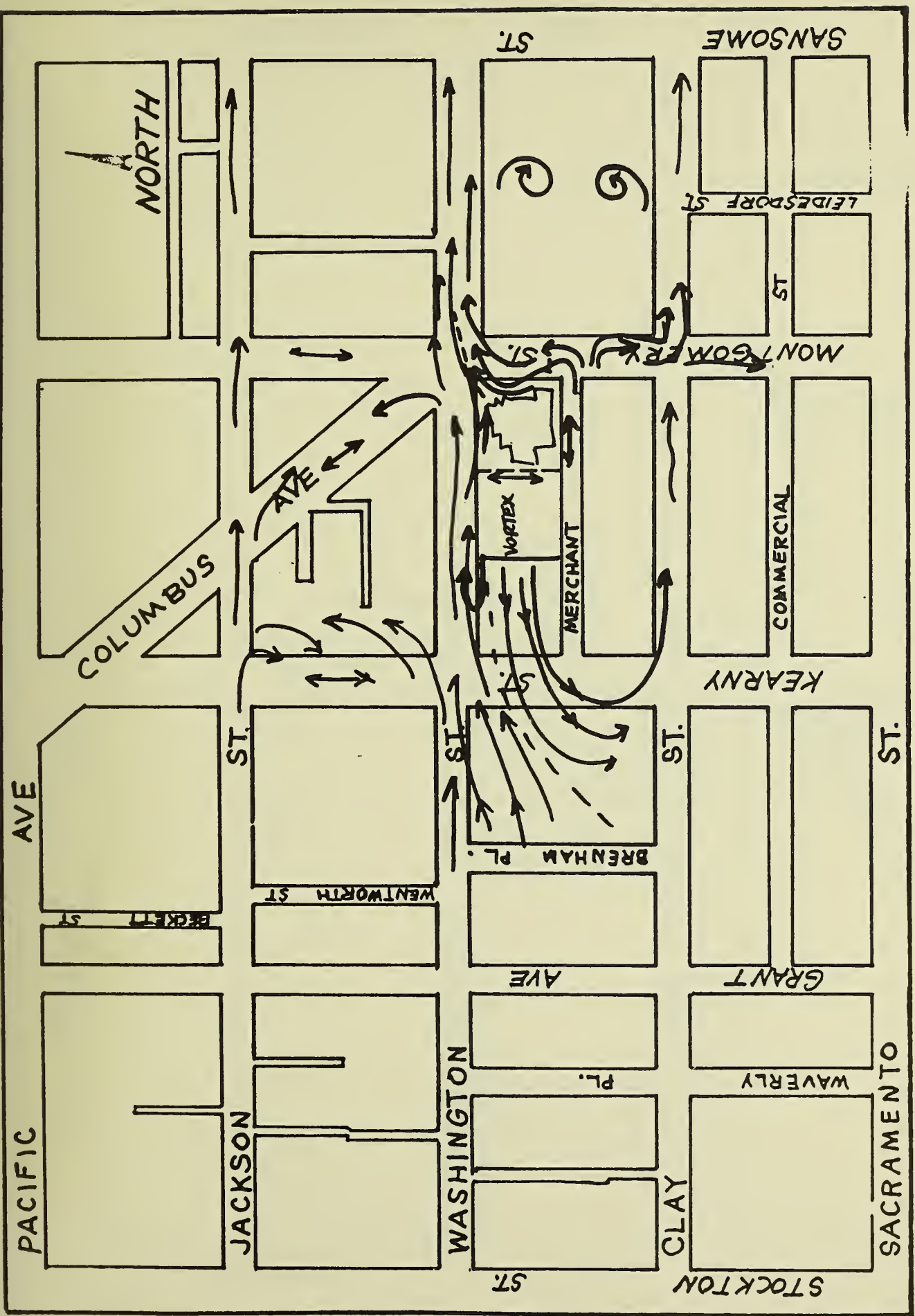


FIGURE B9: WIND FLOWS FOR WESTERLY WIND - PROJECT

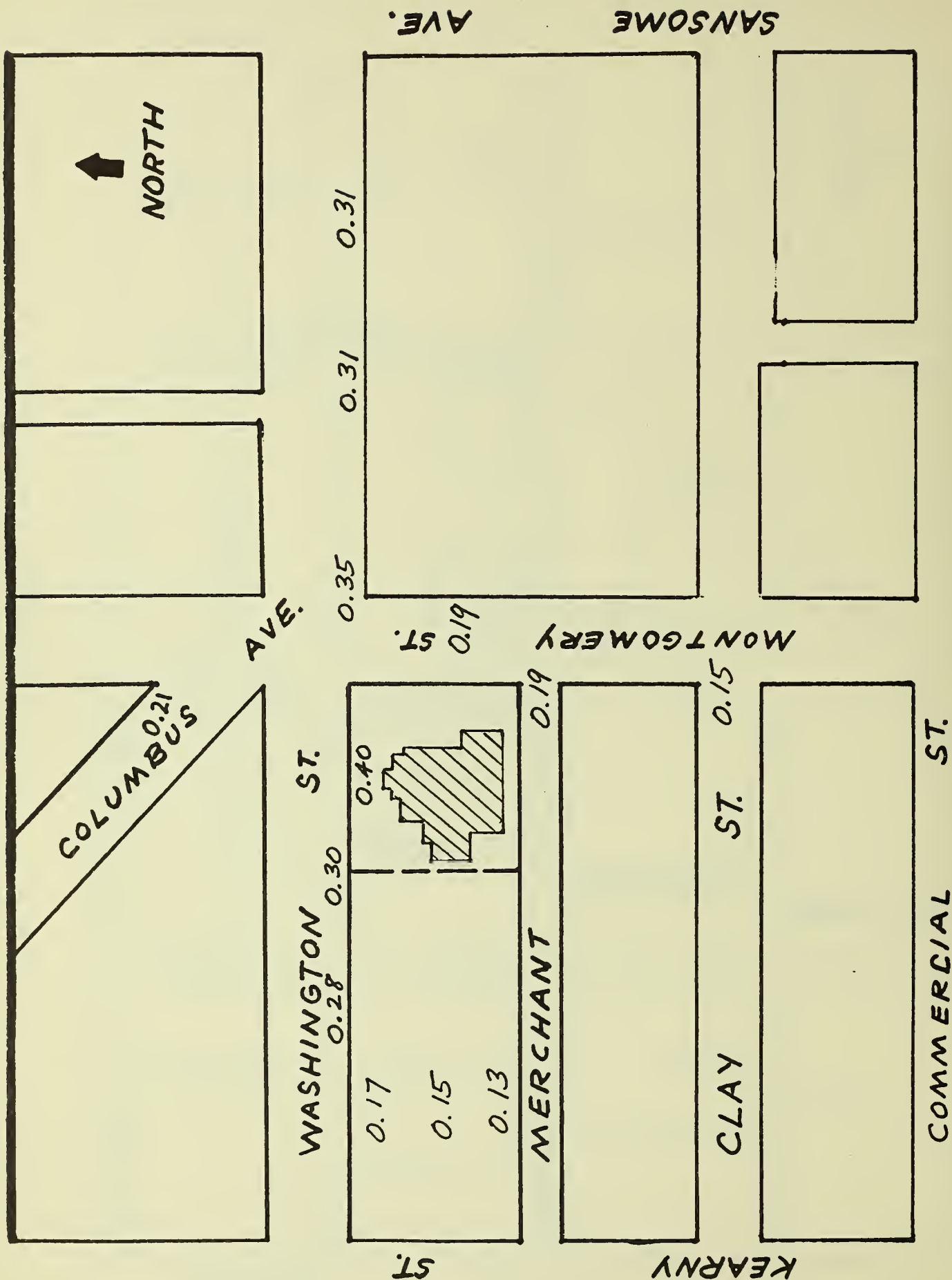


FIGURE B10: WIND SPEED RATIOS FOR WESTERLY WIND - PROJECT

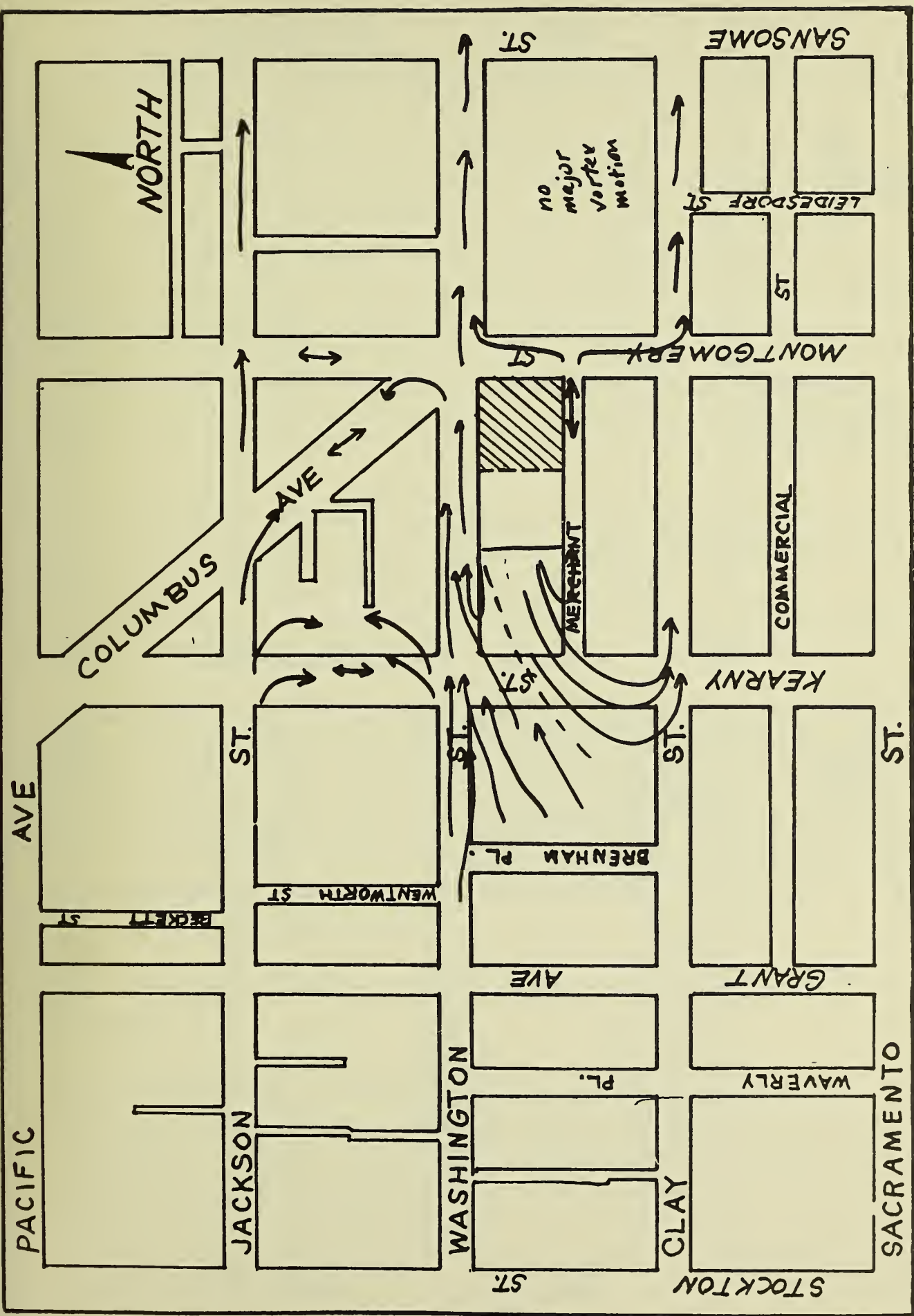


FIGURE B11: WIND FLOWS FOR WESTERLY WIND - ALTERNATIVE 5

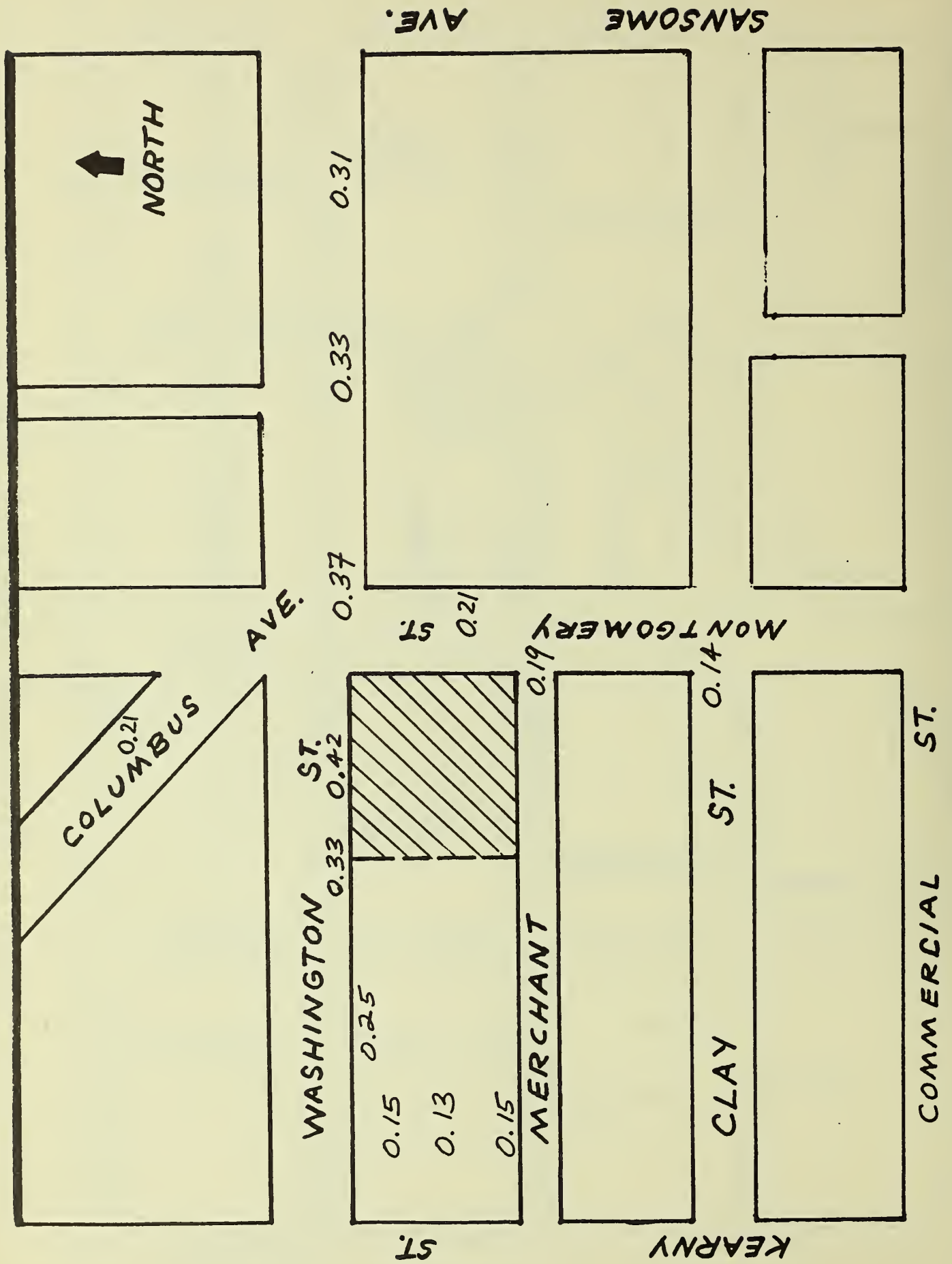


FIGURE B12: WIND SPEED RATIOS FOR WESTERLY WIND - ALTERNATIVE 5

The project would include widened sidewalks, three major building entrances, a street-level pedestrian arcade to facilitate shortened walking distances, and a tower of sculptured form. The building would be setback at the Montgomery/Washington corner, to preserve views from upper Columbus Ave. and respond to the configuration of the Transamerica building. The building setbacks at this corner would extend the entire height of the project and would increase, in a stepped manner, at the upper levels. The faceted upper-floor setbacks, diagonally terracing the northeast corner of the building, were designed to reduce the apparent bulk and scale of the building as seen from the Jackson Square Historic District and Telegraph Hill. The total gross floor area of the building would be approximately 329,800 sq. ft., an FAR of 19:1 and would would the Basic FAR by about 5:1, or approximately 86,200 sq. ft. (excluding cellular foundation, mechanical and parking floor area).

The project sponsor is Crow-Spieker Companies of San Francisco, doing business as Trammell Crow Company. Project architects are Kaplan/McLaughlin/Diaz of San Francisco, and the IBI Group of Newport Beach, CA.

#### POTENTIAL ENVIRONMENTAL EFFECTS

Potential environmental issues associated with project implementation include: transportation, particularly circulation in relation to Chinatown and the Financial District, and transit effects; urban design, the project in relation to adjacent and nearby high-rise buildings, the smaller-scale Jackson Square Historic District and the Telegraph Hill community, including views; traffic-generated air quality effects; shadow and wind effects; energy consumption; and construction noise.

These issues require analysis in subsequent environmental documentation for the project.

Potential environmental issues associated with the project that have been determined in this Initial Study to be insignificant, and, therefore, not to be addressed in subsequent environmental documentation for the project, are described below, and discussed later in this Initial Study.

Land Use Compatibility: The project would be consistent with existing and proposed land uses in the vicinity of the site. The project would comply with the height provisions of the City Planning Code, but would exceed the height recommendations for the site contained in the Department of City Planning document, Guiding Downtown Development.

Noise: After completion, the project would not increase audible noise levels in the project vicinity.

Public Services and Utilities: The demand for public services and utilities would not require additional personnel or equipment, with the exception of fire protection services in the case of a major fire or disaster.

Biology: The project would not directly affect plants or animals, as the site is urbanized. Three of the four lots are covered with buildings or pavement. Lot 25 was covered with structures which were demolished to make way for a street widening. The site is now covered with grass and weeds.

Land/Geology/Soils: The site is on bedrock and the project would not require substantial excavation, grading or dewatering. The average depth of excavation would be about 20 ft. Dewatering would be required only during the construction period. Pile driving would not be required as a mat (cellular) foundation would be used.

Cultural/Historic: No known cultural resources or structures designated to be of architectural or historic importance would be affected by project implementation. See p. 29 for a mitigation measure in case archaeological resources are found during project excavation. The project would result in the removal of the two existing buildings on the site. The building at 643 Montgomery St. was rated in the architectural survey conducted for the Foundation for San Francisco's Architectural Heritage. It is not, however, included in the City's official list of Architecturally and/or Historically Significant Buildings in the Downtown. The building at 639 Montgomery St. was not rated in either architectural survey.

Construction-related Air Quality: Construction activities would not increase the frequency of violations of air quality standards as monitored by the Bay Area Air Quality Management District (BAAQMD) at Van Ness Ave. and Ellis St.,

about one-and-a-quarter miles southwest of the site. See p. 26 for measures which would reduce temporary particulate emissions during construction.

Hazards: Project operation would not increase the risk of explosion or release of hazardous substances, in the event of an accident, or cause other dangers to public health and safety.

Water Quality: Project operation would not affect the quality or quantity of public water or groundwater in the project vicinity. Shallow dewatering would be required during project construction.

A. GENERAL CONSIDERATIONS:

	<u>Yes</u>	<u>Maybe</u>	<u>No</u>	<u>N/A</u>	<u>Disc.</u>
1. Would the project conflict with objectives and policies in the Comprehensive Plan (Master Plan) of the City? (Please see discussion below.)	<u>      </u>	<u>    X    </u>	<u>      </u>	<u>      </u>	<u>    X    </u>
2. Would the project require a variance, or other special authorization under the City Planning Code?	<u>    X    </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>    X    </u>
3. Would the project require approval of permits from City Departments other than DCP or BBI, or from Regional, State or Federal agencies?	<u>      </u>	<u>      </u>	<u>    X    </u>	<u>      </u>	<u>      </u>
4. Would the project conflict with adopted environmental plans and goals?	<u>      </u>	<u>      </u>	<u>    X    </u>	<u>      </u>	<u>      </u>

The project would provide new housing and commercial office space in the Downtown core of San Francisco on a site that is close to local and regional transit facilities. It would comply with Objective 6 of the Commerce and Industry Element of the Comprehensive Plan to support San Francisco as "a prime location for financial, administrative, corporate, and professional activity", and would comply with policies of the Commerce and Industry Element to "maintain a compact downtown core" and to "provide adequate amenities for those who live, work and use Downtown". The project would comply with the Residence Element of the Comprehensive Plan which recommends "multiple-residential development in conjunction with commercial uses in the Downtown commercial area." Additionally, the project would comply with

recently proposed Department of City Planning (DCP) policies which recommend that new office buildings also provide housing (outlined in the DCP study document entitled Guiding Downtown Development, May 1981). The San Francisco Sub-Division Code requires provision of 10% low and moderate income housing in projects which would contain more than 50 dwelling units, provided subsidies are available. The project would provide about 40 condominiums and would not include any low and moderate housing.

The sculptured stepped and set back design of the project's upper northeast- and southwest-facing facades attempts to comply with the Urban Design Element of the Comprehensive Plan by providing a height and bulk transition from the nearby 52-story (778 ft.) Bank of America building at California and Montgomery Sts., the 48-story (853-ft.) Transamerica building, directly east of the site across Montgomery St., and the smaller-scale 2- to 8-story structures which characterize the Jackson Square Historic District, north and northeast of the site. The shaping of the upper part of the project tower is intended by the architect to insure that its vertical elements, which are similar in height to the adjacent Holiday Inn building, would be in different planes, providing a distinct visual separation between the two buildings. The project would also comply with the policy of the Urban Design Element of the Comprehensive Plan to "promote harmony in the visual relationships and transitions between new and older buildings" (Policy 1, "Urban Design Element, Policies for Major New Development").

The project site includes a 4,820 sq. ft. parcel (Lot 25) which is in City ownership and was designated as a potential open space site in the Recreation and Open Space Element of the Comprehensive Plan (Amendment No. 7-8-75, January 4, 1978). The site was examined for development as a downtown mini park. The Recreation and Park Commission (RPC) determined that this parcel is not appropriate for such use because of its size and the shading caused on the parcel by nearby buildings. On April 9, 1981 the Recreation and Park Commission recommended to the City Planning Commission that the designation of the parcel as a potential open space site be removed and the parcel be offered for sale to the public (RPC Resolution No. 12456). The RPC further recommended that a portion of the proceeds from the sale of this property be deposited in the City's Open Space account to be used to develop, redevelop or otherwise improve open space resources within the Chinatown community. The Planning and Recreation and Park Commissions had a joint meeting on

# APPENDIX C: EMPLOYMENT AND HOUSING FACTORS

TABLE C-1: MAJOR OFFICE BUILDING CONSTRUCTION AND CONVERSION IN SAN FRANCISCO AS OF NOVEMBER 1, 1981

Year	Total Gross Sq. Ft. Completed	5-Year Total	5-Year Annual Average	Cumulative Total All Office Bldgs. (Gross Sq. Ft.)	All Downtown Office Bldgs.* (Net Sq. Ft.)
Pre-1960				28,145,000(a)	24,175,000(b)
1960	1,183,000				
1961	270,000				
1962	--				
1963	--				
1964	1,413,000				
		2,866,000	573,200		
1960-1964		(2,580,000)	(516,000)	30,725,000	26,754,000
1965	1,463,000				
1966	973,000				
1967	1,453,000				
1968	1,234,000				
1969	3,256,000				
		8,379,000	1,675,800		
1965-1969		(7,541,000)	(1,508,000)	38,266,000	34,295,000
1970	1,853,000				
1971	--				
1972	1,961,000				
1973	2,736,000				
1974	2,065,000				
		8,615,000	1,723,000		
1970-1974		(7,753,000)	(1,550,000)	46,019,000	42,048,000
1975	536,000				
1976	2,429,000				
1977	2,660,000				
1978	--				
1979	2,532,000				
		8,157,000	1,631,400		
1975-1979		(7,341,000)	(1,458,000)	53,360,000	49,389,000
1980	1,284,000				
1981	3,138,000			57,340,000	53,369,000
Under Construction					
82,84	5,600,000				
1980-1984		(9,020,000)	(1,804,000)	62,380,000	48,409,000
Approved Projects	3,113,000			65,182,000	61,211,000

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TABLE C-1: (continued)

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\*Net equals 90 % of gross. Net new space is added at an increase factor of 90%, since it is assumed that space equal to 10% of a new building is demolished to make land available for the new replacement building.

(a) S.F. Downtown Zoning Study - Working Paper No. 1, January 1966, Appendix, Table 1, Part 1. For pre-1965, includes the area bounded by Vallejo, Franklin, Central Skyway, Bryant and Embarcadero. Also includes 1/3 of mixed use retail/office. For post-1984, includes the entire city.

(b) Gross Floor Space for downtown offices are included for the following functional areas: Financial, Retail, Hotel, Jackson Square, Golden Gateway, Civic Center, South of Market, and Outer Market Street as defined in the 1/66 report. For post 1964, the entire area east of Franklin is included.

SOURCE: Department of City Planning

TABLE C-2: PROJECTED EFFECTS OF DOWNTOWN OFFICE DEVELOPMENT ON REGIONAL HOUSING MARKETS, 1980-85

	Residency of S.F. Office Employees*	Project Demand in 1985		Cumulative Demand 1979 to 1985***		Net Housing Stock Growth 1980-1985	Project Demand as % of Growth 1980 to 1985
		No. Emp.	No. Households**	No. Emp.	No. Households	No. Units	Percent
San Francisco	40	380	200	31,000	17,200	5,000 to 8,000	2.5 to 4.0
Peninsula (San Mateo and Santa Clara Cos.)	18	170	110	13,200	8,800	75,000	0.1
East Bay (Alameda and Contra Costa Cos.)	30	285	180	24,000	16,000	41,000	0.2
North Bay (Marin and Sonoma Cos.)	12	115	65	9,300	6,200	25,000	0.1
TOTAL	100	950	247	77,500	48,200	146,000 to 179,000	0.2

\* Weighted average of expected employees in Federal Reserve Bank (EE 78.207), 101 California Street (EE 78.27), Pacific Gateway, (EE 78.61), and Crocker National Bank (EE 78.298), from 456 Montgomery Street Final EIR (EE 78.178), p. 167.

\*\* Projected housing demand was based on a formula, (the net increase of gross square footage of office space divided by 250, multiplied by 0.22), which was developed by the San Francisco City Planning Department in a memorandum entitled "Housing Requirements for Office Development in San Francisco," July 1981. The same formula was applied to the other regional counties but in the equation the average number of employed adults per household was changed from 1.8 to 1.5.

\*\*\* Based on projected San Francisco housing demand created by downtown office development, in Sedway/Cooke, October 1979, Downtown San Francisco Conservation and Development Planning Program, Phase 1, pp. 47, 48. San Francisco growth estimates are based on ABAG, January 1980, San Francisco Bay Area Housing Activity Report, Number 2, and on Mary Schlosser, Research Analyst, Population Research Unit, California Department of Finance, telephone communication, August 13, 1980. Other housing market estimates are based solely on Department of Finance data. Growth rates are based on averaged rates (San Francisco 0.4%, Peninsula 2.2%, East Bay 1.2%, North Bay, 2.5%).

SOURCE: Environmental Science Associates, Inc.

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## APPENDIX D: TRANSPORTATION, CIRCULATION AND PARKING

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TABLE D-1: VEHICULAR LEVELS OF SERVICE

Level of Service	Description	Volume/Capacity* v/c Ratio
A	Level of Service A describes a condition where the approach to an intersection appears quite open and turning movements are made easily. Little or no delay is experienced. No vehicles wait longer than one red traffic signal indication. The traffic operation can generally be described as excellent.	0.60
B	Level of Service B describes a condition where the approach to an intersection is occasionally fully utilized and some delays may be encountered. Many drivers begin to feel somewhat restricted within groups of vehicles. The traffic operation can be generally described as very good.	0.61- 0.70
C	Level of Service C describes a condition where the approach to an intersection is often fully utilized and back-ups may occur behind turning vehicles. Most drivers feel somewhat restricted, but not objectionably so. The driver occasionally may have to wait more than one red traffic signal indication. The traffic operation can generally be described as good.	0.71- 0.80
D.	Level of Service D describes a condition of increasing restriction causing substantial delays and queues of vehicles on approaches to the intersection during short times within the peak period. However, there are enough signal cycles with lower demand such that queues are periodically cleared, thus preventing excessive back-ups. The traffic operation can generally be described as fair.	0.81- 0.90
E	Capacity occurs at level of service E. It represents the most vehicles that any particular intersection can accommodate. At capacity there may be long queues of vehicles waiting up-stream of the intersection and vehicles may be delayed up to several signal cycles. The traffic operation can generally be described as poor.	0.91- 1.00
F	Level of Service F represents a jammed condition. Back-ups from locations downstream or on the cross street may restrict or prevent movement of vehicles out of the approach under consideration. Hence, volumes of vehicles passing through the intersection vary from signal cycle to signal cycle. Because of the jammed condition, this volume would be less than capacity.	1.00

\*Capacity is defined as Level of Service E.

SOURCE: San Francisco Department of Public Works, Traffic Division, Bureau of Engineering 1965.

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TABLE D-2: ESTIMATED EXISTING VEHICLE TRAFFIC VOLUMES IN THE VICINITY OF  
THE PROJECT SITE (number of vehicles)\*

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<u>Street</u>	<u>Section</u>	<u>24 Hour</u>	<u>P.M. Peak Hour**</u>	<u>Max. 8 Hours</u>
Washington	Sansome-Montgomery	11,300	1,000	6,440
Montgomery	Washington-Clay	16,400	1,200	9,350
Clay	Front-Davis	18,200	1,330	10,370
Sansome	Pacific-Broadway	7,900	1,050	4,500

\* The traffic volume data shown are derived from historical data for 1976, 1978, and 1979, obtained from the San Francisco Department of Public Works, Bureau of Traffic Engineering. Estimates of some 1981 traffic volumes were made by TJKM based on manual intersection count data collected by TJKM on Thursday, July 16, and Monday through Wednesday July 20-22, 1981, and on the historical data for 1976, 1978, and 1979.

\*\*Peak hour is the single peak hour during the peak period between 4:00 and 6:00 p.m.

SOURCE: TJKM, Transportation Consultants

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TABLE D-3: PROJECTED VEHICLE VOLUMES ON STREETS NEAR THE PROJECT SITE  
IN 1984

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<u>Street</u>	<u>Section</u>	<u>1984 Base</u>			<u>1984 Base + Project</u>			
		<u>24</u>	<u>Peak</u>	<u>Max</u>	<u>24</u>	<u>Peak</u>	<u>Max</u>	<u>%**</u>
		<u>Hour</u>	<u>Hour*</u>	<u>8 Hour</u>	<u>Hour</u>	<u>Hour</u>	<u>8 Hour</u>	<u>Inc</u>
Washington	Sansome-Montgomery	11,370	1,010	6,480	11,610	1,050	6,620	4
Montgomery	Washington-Clay	16,500	1,210	9,410	16,865	1,270	9,620	5
Clay	Front-Davis	20,680	1,750	1,1780	20,930	1,800	11,925	3
Sansome	Pacific-Broadway	8,460	1,160	4,820	8,710	1,210	4,960	4

\* Peak hour is the single peak hour during the peak period between 4:00 and 6:00 p.m.

\*\*Percent increase over the 1984 Base peak hour traffic volume.

SOURCE: TJKM, Transportation Consultants

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TABLE D-4: PEDESTRIAN FLOW REGIMENS

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<u>Flow Regime</u>	<u>Walking Speed Choice</u>	<u>Conflicts</u>	<u>Flow Rate (P/F/M)*</u>	
			<u>Average</u>	<u>Platoon</u>
Open	Free Selection	None	0.5	0.5
Unimpeded	Some Selection	Minor	0.5-2	
Impeded	Some Selection	High Indirect Interaction	2-6	0.5-6
Constrained	Some Restriction	Multiple	6-10	6-10
Crowded	Restricted	High Probability	10-14	10-4
Congested	All Reduced	Frequent	14-18	14-18
Jammed**	Shuffle Only	Unavoidable	18	

\* P/F/M = Pedestrians per foot of sidewalk width per minute.

\*\* For Jammed Flow, the (attempted) flow rate degrades to zero at complete breakdown.

SOURCE: Pushkarev, Boris and Jeffry M. Zupan, Urban Space for Pedestrians, Cambridge, MA. MIT Press, 1975.

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TABLE D-5: PEAK 15-MINUTE PEDESTRIAN VOLUMES IN 1981 (PROJECT SIDE OF STREET)

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Sidewalk	Effective Width*	Volume**			Flow Rate***			Pedestrian Flow Regime		
		A.M.	NOON	P.M.	A.M.	NOON	P.M.	A.M.	NOON	P.M.
Montgomery St.	7.0 ft.	40	170	140	0.4	1.6	1.4	Open	Unim	Unim
Washington St.	8.5 ft.	30	190	50	0.2	1.5	0.4	Open	Unim	Open

\*Effective widths take account of poles, planter boxes, people standing at store windows, etc.

\*\*Pedestrians per 15 minutes.

\*\*\*Pedestrians per minute per foot of sidewalk width.

+Abbreviations are the following:

Unim = Unimpeded; Impd = Impeded

SOURCE: TJKM, based on manual pedestrian counts made by TJKM on Wednesday, July 22, 1981

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TABLE D-6: P.M. PEAK 15-MINUTE CROSSWALK VOLUMES IN 1981

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Crosswalk	Width	Volume P.M.	Approach Rate* P.M.	Green Signal Phase	Crossing Rate** P.M.	Pedestrian Flow Regime P.M.	Reservoir Space*** (feet)
Montgomery Washington	11 ft.	130	0.8	40%	2.0	Impeded	1.2
Washington at Montgomery	11 ft.	65	0.4	60%	0.7	Unimpeded	0.4

\*Approach rate is pedestrians per minute per foot of crosswalk width.

\*\*Crossing rate is pedestrians per foot per minute of green signal time

\*\*\*Reservoir space is a measure of depth of sidewalk used to store pedestrians queued to cross (see Pushkarev and Zupan, p. 110); assumes 5 square feet per person waiting

SOURCE: TJKM, based on manual pedestrian counts made by TJKM on Monday - Wednesday, July 20-22, 1981.

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TABLE D-7: EXISTING PEAK HOUR TRANSIT RIDERSHIPS AND CAPACITIES  
(Selected Routes;\* Peak Direction Only)

	<u>Riders</u>	<u>Vehicles</u>	<u>Capacity+</u>		<u>% Occupancy</u>		<u>Peak</u>
			<u>Seated</u>	<u>Total</u>	<u>Seated</u>	<u>Total</u>	
BART:							
TransBay	10,500	122 **	8,780	13,180	120	80	p.m.
Westbay	6,360	89 **	6,410	9,610	99	66	p.m.
A-C Transit	9,130	199	9,990	12,490	91	73	p.m.
SamTrans	970	18	850	1,060	114	92	p.m.
So. Pacific RR	4,395	9 ***	11,000	11,000	40	40	p.m.
Golden Gate Transit							
Motor Coach	5,050	122	5,470	6,710	92	75	a.m.
Ferry	1,070	3	1,410	2,075	76	52	p.m.

\* SamTrans: 7F, 7B, 5M, 7R;

A-C Transit: A,B,BX,C,CH/CB,E,EX,F,FSG/FX,G,H,K,KH,L,LX,N,NX,O,OX,R/RH,RD/RF/RCV,S,SW,V,W,Y.

\*\* BART data is on a per car basis. Fourteen trains ran in each direction in the peak hour. Eastbound there were 7 Concord trains (average 10 cars per train); 4 Fremont trains (average 10 cars per train); and 3 Richmond trains (average 4 cars per train).

\*\*\* Number of trains, assuming 10 cars per train to reflect available rolling stock. Actual number of cars per train is less than 10.

+ Capacity has been calculated based on the following per-vehicle capacities:

	<u>Seated Passengers</u>	<u>Total Seated and Standing Passengers</u>
BART	72	108
A-C Transit	48	60
SamTrans	47	59
Southern Pacific	100/150	100/150
Golden Gate Transit Motor Coach	45	55
Sausalito Ferry	400	575
Larkspur Ferry	510	750

SOURCE: TJKM

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TABLE D-8: BUILDINGS INCLUDED IN THE CUMULATIVE ANALYSIS

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The buildings which were elements of the cumulative transportation analysis are in or near the Downtown Business district and are listed below by their Office of Environmental Review EIR file number and name.

74.253	444 Market: Shaklee
74.164	Pacific Bldg. III - Apparel Mart
77.256	Levi's Plaza
78.27	101 California
78.207	Federal Reserve Bank
78.298	1 Montgomery: Crocker Tower
78.334	1 Sansome
78.413	150 Spear Street
No EE Number	Embarcadero 4
79.57	DAON Building (Battery & Sacramento)
79.169	The Pacific Lumber Bldg. (Washington & Sansome)
79.178	456 Montgomery
79.196	315 Howard
78.61	Pacific Gateway
80.26	101 Montgomery*
80.268	Five Fremont Center*
79.236	101 Mission*
80.171	Hotel Ramada*
79.257	Tower II, Hilton Hotel*
79.283	Holiday Inn*
80.57	25 Jessie St (neg. dec.)*
80.355	New Montgomery Place PDEIR*
80.339	San Francisco Federal Savings Building PDEIR*
80.296	Bank of Canton Headquarters Building PDEIR*
80.349	Spear/Main*
81.25	1155 Market St.*
81.61	135 Main PDEIR*
81.183	Mission/Main PDEIR*
81.244D	185 Berry Street (China Basin)*

\*Not on Attachment 2 (October 1980) to "Guidelines," included at request of Office of Environmental Review, San Francisco Department of City Planning.

SOURCE: TJKM

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TABLE D-9: ESTIMATED P.M. PEAK-HOUR WEEKDAY TRAVEL\* GENERATED BY THE PROJECT

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Origin/Destination	%	Total	Auto	Transit	Walk**
North Bay	11	80	50	30	-
East Bay	23	165	75	90	-
Pennisula	15	105	60	45	-
San Francisco	51	370	125	225	20
Total	100	720	310	390	20

\* Work and non-work person trip ends

\*\*Persons who walk to the site without using any other form of transportation

Source: TJKM

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TABLE D-10: PROJECTED 1984 P.M. PEAK MUNI ANALYSIS

Line	1984 Base			Project Riders	1984 Base + Project		
	1984 Capacity	Riders	Total Load Factor		Riders	Total Load Factor	Project Load Factor
1	450	546	1.21	2	548	1.22	0.01
1X	750	839	1.12	4	843	1.12	0.00
2	600	785	1.31	3	788	1.31	0.00
3	525	696	1.33	3	699	1.33	0.00
4	375	322	0.86	1	323	0.86	-
5	1275	1363	1.07	6	1369	1.07	0.00
6	675	692	1.03	3	695	1.03	0.00
7	450	453	1.01	2	455	1.01	0.00
8	1125	910	0.81	4	914	0.81	-
9	750	732	0.98	3	735	0.98	-
11	750	932	1.24	4	936	1.25	0.01
12	525	674	1.28	3	675	1.29	0.01
14	1275	1683	1.32	7	1690	1.33	0.01
14GL	300	354	1.18	2	356	1.19	0.01
14X	675	906	1.34	4	910	1.35	0.01
15	975	1220	1.25	5	1225	1.26	0.01
21	825	914	1.11	4	918	1.11	0.00
27	300	213	0.71	1	214	0.71	-
30	1425	1427	1.00	7	1434	1.01	0.01
30X	975	1100	1.13	5	1105	1.13	0.00
31	525	687	1.31	3	690	1.31	0.00
31X	675	785	1.16	3	788	1.17	0.01
38	1125	1356	1.21	6	1362	1.21	0.00
38L	675	898	1.33	4	902	1.34	0.01
38AX	600	691	1.15	3	694	1.16	0.01
38BX	300	266	0.89	1	267	0.89	-
42	300	320	1.07	1	321	1.07	0.00
45	675	839	1.24	4	843	1.25	0.01
55	1650	1974	1.20	9	1983	1.20	0.00
71	375	527	1.41	2	529	1.41	0.00
72	300	381	1.27	2	383	1.28	0.01
80X	600	583	0.97	3	586	0.98	-
J	1235	1105	0.89	5	1110	0.90	-
K	3900	4314	1.11	19	4333	1.11	0.00
N	2400	2836	1.18	12	2848	1.19	0.01

Note: The 83 line is also in the vicinity of the site, but no ridership data are yet available for it.

SOURCE: San Francisco Department of City Planning, and TJKM

# APPENDIX E: AIR QUALITY

TABLE E-1: SAN FRANCISCO AIR POLLUTANT SUMMARY 1978-1980

STATIONS: 939 Ellis Street and 900 23rd Street, San Francisco\*

<u>POLLUTANT:</u>	<u>STANDARD</u>	<u>1978</u>	<u>1979</u>	<u>1980*</u>
<b>OZONE (O<sub>3</sub>) (Oxidant)</b>				
1-hour concentration (ppm /a/)				
Highest hourly average	(0.08) 0.12 /b,c/	0.11	0.08	0.09
Number of standard excesses		(4) 0	0	0
Expected Annual Excess/c/		0.3	0.0	0.0
<b>CARBON MONOXIDE (CO)</b>				
1-hour concentration (ppm)				
Highest hourly average	35 /b/	17	20	10
Number of standard excesses		0	0	0
8-hour concentration (ppm)				
Highest 8-hour average	9 /b/	9.4	13.8	7.5
Number of standard excesses		1	2	0
<b>NITROGEN DIOXIDE (NO<sub>2</sub>)</b>				
1-hour concentration (ppm)				
Highest hourly average	0.25 /d/	0.30	0.16	0.17
Number of standard excesses		4	0	0
<b>SULFUR DIOXIDE (SO<sub>2</sub>)</b>				
24-hour concentration (ppm)				
Highest 24-hour average	0.05 /d/	0.024	0.034	0.018
Number of standard excesses/e,f/		0	0	0
<b>TOTAL SUSPENDED PARTICULATE (TSP)</b>				
24-hour concentration (ug/m <sup>3</sup> /g/)				
Highest 24-hour average	100 /d/	128	117	173
Number of standard excesses/f/		1	1	6
Annual concentration (ug/m <sup>3</sup> )				
Annual Geometric Mean	60 /d/	42	42	52
Annual standard excess		No	No	No
<b>LEAD</b>				
Calendar quarter concentration (mg/m <sup>3</sup> )				
Highest quarterly average	1.5 /b/	1.19	0.95	0.53
Number of standard excesses		0	0	0

\* In January 1980 all of the pollutant-monitoring functions of the 939 Ellis St. Station were transferred to the 900 23rd St. Station.

Table E-1 (continued)

/a/ ppm: parts per million.

/b/ National standard, not to be exceeded more than once per year (except for annual standards which are not to be exceeded).

/c/ The national ozone standard was revised from 0.08 ppm to 0.12 ppm in January 1979. The number of excesses shown in parentheses is of the old 0.08 ppm standard in effect at the time. Expected Annual Excess is a three-year average of annual excesses of the new 0.12 ppm standard.

/d/ California standard, not to be equaled or exceeded.

/e/ The sulfur dioxide standard is considered to be exceeded only if there is a concurrent excess of the state ozone or suspended particulate standards at the same station. Otherwise, the national standard of 0.14 ppm applies.

/f/ Number of observed excess days (measurements taken once every six days).

/g/  $\text{ug}/\text{m}^3$ : micrograms per cubic meter.

SOURCE: BAAQMD, 1978 - 1980, Contaminant and Weather Summaries.

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